

## 4.0 ENVIRONMENTAL IMPACT ANALYSIS

### G. WILDLAND FIRES/FIRE PROTECTION

---

#### INTRODUCTION

This section provides a qualitative analysis of potential risks to human health and safety related to wildland fires that could result from implementation of the TSMP, as well as the Plan's effect on overall fire protection services in the Plan area. This analysis is based on information presented in the Town of Mammoth Lakes General Plan, Mammoth Lakes General Plan Environmental Impact Report, and data provided by the Mammoth Lakes Fire Protection District (MLFPD).

#### 1. ENVIRONMENTAL SETTING

##### a. Regulatory Framework

##### (1) Wildland Fires

##### (a) Federal Fire Regulations

The National Forest Service prepares Land and Resource Management Plans (LRMPs) for all National Forest lands in the nation. The Inyo National Forest (INF) LRMP, the most recently adopted version of which was approved in 1988, is the plan that prescribes goals, objectives, and forest-wide management guidelines related to wildland fires and fuel management within the INF. The relevant LRMP goals, objectives, and management prescriptions, which are listed below.

##### Goals:

The Forest has a cost-effective fire management program that minimizes resource losses and serious or long-lasting adverse effects from wildfire. The Forest Service mission in fire management is to use fire as a resource management tool.

##### Policies:

- Implement a fire management program consisting of: 17 percent prevention and detection, 83 percent suppression and aviation, and the application of all appropriate wildfire suppression strategies (confinement, containment, and control).
- Use Prescriptions and Management Area Direction and fire management action plans when determining the appropriate wildfire suppression strategy.
- Use prescribed fire as a management tool.
- Consider both existing conditions and the effect of future management activities in the area surrounding the project area when developing treatment standards for fuels.

- Coordinate with local fire districts in the development of major new structural facilities on National Forest lands.
- Allowable burned acre objectives for specific areas will be determined in the preparation of fire management area plans.
- The Forest Service mission in fire management is to use fire as a resource management tool.

Management Prescriptions:

- Use the fire suppression strategies of confinement, containment, or control for management of unplanned natural fires. Control all unplanned human-caused fires.
- Obtain approval prior to emergency use of the following suppression activities: Regional Forester approval for tractor use and/or for heliport construction; Forest Supervisor approval for heliport construction, retardant application other than short-term or fugitive-dye, wheeled vehicles, generators, or chain saws (unless for direct suppression).
- Apply low-impact suppression tactics such as reliance upon natural barriers unless more direct attack is needed to protect persons or adjacent property values. Favor the use of water over land disturbance. Favor cold-trailing over handline construction.
- Mitigate temporary fire camps, heliports, evidence of vehicles, and other disturbances created by emergency fire suppression activities.
- Use prescribed fire (planned ignitions only) to reduce the risks and consequences of wildfire within wilderness or escaping from wilderness to an acceptable level.
- Minimize environmental disturbance when suppressing fires.
- Prescribed fire may be used for habitat improvement.
- Use no heavy equipment or fire-retardant chemicals for controlling fires without approval of the Forest Supervisor.
- Allow natural fuels to accumulate.
- Control all wildfires and use a technique of fire suppression that minimizes landscape alteration and ground disturbance.
- Prescribed fire may be used to increase forage production.

**(b) State Fire Regulations**

Assembly Bill 337 (the Bates Bill, adopted September 29, 1992) was a direct result of the great loss of lives and homes in the Oakland Hills "Tunnel Fire" of 1991. The Bates Bill Process is used to identify Very High Fire Hazard Severity Zones in Local Responsibility Areas. Government Code Section 51178 specifies that the Director of the California Department of Forestry (CDF), in cooperation with local fire authorities, shall identify areas that are Very High Fire Hazard Severity Zones (VHFHSZs) in Local Responsibility Areas (LRAs), based on consistent statewide criteria and the expected severity of fire hazard. State Responsibility Areas (SRAs) include all lands regardless of ownership, except for cities and federal lands. Although the State has financial responsibility for SRAs, it is not the State's responsibility to provide fire protection services to any building or structure located within a wildland area, unless the CDF has entered into a cooperative agreement with a local agency for those purposes pursuant to Public Resources Code Section 4142. Under

Assembly Bill 3819, passed in 1994 (AB 3819 Willie Brown), “Class A” roofing, minimum clearances of 30 feet around structures, and other fire defense improvements are required in VHFHSZs.

Government Code Section 51178 states that a local agency may, at its discretion, exclude from the requirements of Section 51182 an area identified as a VHFHSZ by the CDF. This requires a finding, supported by substantial evidence, that the requirements of Section 51182 are not necessary for effective fire protection within the area. Conversely, local agencies may include areas not identified as a VHFHSZ by the CDF, following a finding that the requirements of Section 51182 are necessary for effective fire protection. According to Section 51182, such changes made by a local agency shall be final and cannot be rebutted by the CDF.

Wildland areas require disclosure for real-estate transactions. Specifically, Assembly Bill 6 (AB6) requires that both types of fire hazard areas (SRAs and VHFHSZs) be disclosed in real estate transactions. Civil Code Section 1103(c)(6) also requires real estate sellers to inform prospective buyers whether or not a property is located within a wildland area that could contain substantial fire risks and hazards.

Public Resources Code Section 4290 requires minimum statewide fire safety standards pertaining to the following:

- Road standards for fire equipment access;
- Standards for signs identifying streets, roads, and buildings;
- Minimum private water supply reserves for emergency fire use; and
- Fuel breaks and greenbelts.

Wildland fire areas are also subject to Public Resources Code Sections 4291 through 4299, which require property owners in such areas to conduct maintenance in order to reduce the fire danger.

The California Emergency Services Act, (Government Code [GC], Title 2, Division 1, Chapter 7, Section 8550 et. seq.), states that “the State Emergency Plan shall be in effect in each political subdivision of the state, and the governing body of each political subdivision shall take such action as may be necessary to carry out the provision thereof.” The act provides the basic authorities for conducting emergency operations following the proclamations of emergencies by the Governor or appropriate local authority, such as a City Manager.

### **(c) Local Fire Regulations**

Chapter 15.04.010 of the Town of Mammoth Lakes Municipal Code (MLMC) “Uniform Building Code – Section 102” was enacted for the purpose of adopting rules and regulations pursuant to the state housing law and the Health and Safety Code, for the protection of the public health, safety and general welfare of the occupants and the public; governing the creation, construction, enlargement, conversion, alteration, repair, moving, removal, demolition, occupancy, use, height, fire protection, sanitation, ventilation, and maintenance of any building used for human habitation. The State Uniform Fire Code, as adopted by the International Conference of Building Officials and the National Fire Protection Association, is the effective fire code of the Town.

## **(2) Fire Protection Services**

All new construction must comply with the applicable provisions as set forth in the MLMC, including Uniform Building Code--Section 102, as indicated above. The MLMC also contains, by reference, State of California Title 24 construction standards and fire safety measures. In addition, the Town adopted an updated Master Facility Plan, Capital Improvement Program and Development Impact Fee schedule in 2005, and fees are adjusted for market conditions every July starting in 2006. All of the required fire suppression facilities, vehicles and equipment needed to service buildout of the General Plan are included in the Plan and program. The Town currently collects between \$745.00 and \$1,561.00 per unit of new residential development and between \$0.99 and \$2.02 per square foot for non-residential uses to fund the required fire suppression equipment.

### **b. Existing Conditions**

#### **(1) Wildland Fires**

The Town's location relative to National Forest lands and the large areas of urban interface with forest vegetation increase the susceptibility of the Town to wildland fire. The combination of highly flammable fuel, long dry summers, and steep slopes create the potential for wildland fires in the Project Area. Wildland fires in the National Forest can be attributed almost exclusively to either lightning strikes or human activity. Ninety-nine percent of fires within the Sierra Nevada National Forests have been contained to less than 100 acres. The one percent of wildfires that exceeded 100 acres in the last quarter-century accounted for almost 98 percent of the total acres burned.

Wildfires can result in death, injury, economic loss, and heavy public investment in fire fighting efforts. Woodlands and other natural vegetation can be destroyed, resulting in loss of timber, wildlife habitat, scenic quality, and recreational resources. Soil erosion, sedimentation of fisheries and reservoirs, and downstream flooding can also result from wildland fires.

Fire has been and remains a natural and important component of the Sierra Nevada landscape and ecosystem. Wildlands must burn or otherwise be managed periodically through controlled burns to maintain ecological viability. Fuel maintenance, such as controlled burning, is an effective means of mitigating uncontrolled wildland fires, thereby protecting human habitation and development.

Fire hazard and risk are measured by the amount of fuel available to burn at any given time in a given area and the likelihood that an ignition would occur. Rankings within the USFS Fire Risk and Hazard Index are based on expected fire behavior, the length of time that fuels are available to burn during the fire season, and the likelihood that a fire would occur based on ignition history. The risk factors are used to provide a relative ranking of fire risk, hazard, and susceptibility to large severe fire. Fire hazard severity has been mapped by the CDF, with the entire Project Area rated as a VHFHSZ: i.e., having a very high fire potential. The Town, the Mammoth Lakes Fire Protection District (MLFPD), the USFS, and Mono County continually strive to minimize wildland fire risks.

In response to the 2002 fire season, the Eastern Sierra Regional Fire Safe Council (ESRFSC), which is based in Bishop, prepared a handbook called the Fire Safe Plan. This handbook is designed to help east side residents of Inyo and Mono Counties improve their defense against wildland fires. The ESRFSC is comprised of private citizens advised by the USFS, CDF, and BLM. The ESRFSC collaborates with local volunteer fire departments

and assists CDF as they train fire prevention volunteers to perform residential fire hazard inspections within Eastern Sierra communities. Volunteers work with homeowners to raise awareness concerning wildland fire risks and methods of home hazard reduction.

The California Public Resource Code (Section 4291) requires property owners to reduce fire hazards by removing dead vegetation, creating a ten-foot clearance around propane tanks, removing tree limbs that are within ten feet of the residence, removing leaves and pine needles from roofs and rain gutters, installing a half-inch mesh screen on stovepipes or chimneys, installing spark arresters on all internal combustion engines, and by obtaining burn permits. ESRFSC suggests that Section 4291 offers insufficient protection for a residence built on a slope and/or on property surrounded by flammable continuous vegetation, such as forest with understory or brush. In most cases in the Eastern Sierra, more defensible space is necessary to create a safety zone. ESRFSC has included a section entitled "Firescaping" in its plan. This section includes numerous lists of firesmart plants as well as a list of where to purchase plants locally.

In response to management direction from the Sierra Nevada Forest Plan Amendment (SNFPA) (2004) and the National Fire Plan (NFP) (2000), USFS crews began constructing the Mammoth Lakes Fuelbreak on August 1, 2002. This project is designed to protect the north end of Mammoth Lakes from fire and treat approximately 400 acres of urban interface (the 0.25 mile Defense Zone defined in the NFP). The \$400,000 project is funded by the NFP. The most critical 350 acres were contracted out for mowing in the spring of 2003 with completion of the fuel break project in 2004. Mowing was completed using uneven edges to minimize visual effects as well as impacts to locally important resources such as terrestrial and aquatic animals, heritage resource sites, watershed function and spread of undesired plant species. The fuelbreaks are monitored annually by the USFS and depending on regrowth of brush, may be re-mowed every five years. Since 2003 MLFPD and the USFS have initiated fuels reduction projects at various locations within and outside the urbanized area, in an effort to reduce wildland fire threat.

## **(2) Fire Protection Services**

The Mammoth Lakes Fire Protection District (MLFPD) provides fire protection and emergency response to the Project Area including the Lakes Basin, Camp High Sierra, and the Mammoth Mountain Ski Area (MMSA). The MLFPD service area includes approximately 3,000 acres of mountain resort area in and around the Town and over 2,500 acres within the Town. Additionally, MLFPD provides fire protection services and emergency response to the upper middle fork of the San Joaquin, Red's Meadow, and Devil's Postpile National Monument (DEPO) located in Madera County. The MLFPD currently utilizes approximately 60 volunteer and four full-time fire fighters.

The MLFPD maintains an extensive system of fire facilities and requisite response vehicles and equipment. It currently responds to calls for service from two fire stations located within the MLFPD, with a third facility being planned near Main Lodge to provide increased protection.

Fire Station No.1, the primary station, is located at 3150 Main Street and was recently replaced with a larger, more updated facility that was completed in 2006. The new updated facility includes a total of 17,600 square feet and contain administrative offices, as well as expanded housing facilities for full-time fire staff. The second station, Fire Station No.2, is located at 1574 Old Mammoth Road and contains housing facilities for full-time employees. Fire Station No. 2 also functions as a training facility and houses the training tower.

The combined stations are staffed with up to 60 volunteer personnel who are in compliance with National Fire Protection Association recommendations and four full-time employees, including the Chief. Two paramedics employed by Mono County currently are based in Fire Station No. 1 and respond to all MLFPD calls. The MLFPD has a sizeable fleet of response units (each fully equipped) consisting of the following: five engines; one aerial truck; one Chevy rescue unit; one Kenworth tender; one Case loader; two utility vehicles; and two Ford staff trucks. The Town currently has a fire rating of three, as a result of an Insurance Service evaluation conducted within the Town. Fire ratings range from one to ten, with one representing the best rating.<sup>1</sup>

In addition to MLFPD facilities, equipment, and personnel, the Town is also served by other fire protection agencies through a mutual aid agreement with MLFPD. Mono County alone contains eleven fire protection districts, all of which belong to a county fire service association and are party to a countywide mutual aid agreement. The agreement formalizes the procedure for each district to send personnel and equipment to fires and emergencies beyond district boundaries when needed. The districts have also established informal service areas for the unserved private lands that are outside of any local fire protection district. These informal service areas reflect a recognized moral – not legal – responsibility of the districts to assist in the protection of life and property in such areas. MLFPD maintains an automatic aid agreement with the Long Valley Fire Protection District (LVFPD) and a sphere of influence agreement with the Bishop Fire Department (BFD) covering areas located outside of both districts. MLFPD also maintains assistance by hire with the Bureau of Land Management (BLM), USFS, and CDF.

## **2. ENVIRONMENTAL IMPACTS**

### **a. Methodology**

#### **(1) Wildland Fires**

The analysis of impacts regarding wildland fires in the Project Area considers existing regulations that address fire hazards, future uses and activities in the Project Area that would occur as a result of TSMP implementation, and future fire management strategies and policies to be implemented in the Project Area as a result of the TSMP. Based on these considerations, a determination is made as to whether there would be an increased potential for wildland fire hazards to occur in the Project Area.

#### **(2) Fire Protection Services**

Potential impacts related to fire protection were evaluated based on the ability of existing and planned MLFPD staffing, equipment, and facilities to meet the additional demand for fire protection and emergency medical services resulting from implementation of the TSMP. The MLFPD evaluates service impacts of new development by assessing the net addition to the building stock (new construction minus demolition), the types of uses proposed, the types of structures proposed, as well as the adequacy of response times and fire flow requirements.

---

<sup>1</sup> Chief Harold Ritter, MLFPD, Personal Communication, November 5, 2004.

## **b. Thresholds of Significance**

### **(1) Wildland Fires**

Based on CEQA Guidelines Appendix G, the project would be considered to have a significant impact relative to wildland fire hazards if the project would:

- Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

### **(2) Fire Protection Services**

Based upon CEQA Guidelines Appendix G, the project would be considered to have a significant impact on public services if the project were to:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
  - Fire protection

## **c. Analysis of Project Impacts**

### **(1) Wildland Fires**

*4.G-1 Implementation of the TSMP could incrementally increase exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.*

As noted above, the Project Area has been rated as having a very high fire potential. The implementation of the TSMP would improve the existing trails system and provide new trails and related facilities for existing and future users. The implementation of the TSMP is not, by itself expected to result in a significant increase in the number of users in the system as a whole, which will be more closely related to overall growth in resident and visitor populations. However, implementation of the TSMP may increase the frequency and amount of use of certain trails and recreational facilities within the Project Area, and/or change patterns of use as certain trail segments are improved or enhanced connectivity is provided. An increase in trail and recreational facility usage does not necessarily indicate an increase in wildland fire hazards; however, it is possible that increases in trail use and other activities in the Project Area may incrementally increase the potential for wildland fires due to cigarette smoking, summertime off-road vehicle use or other activities. While this increase in risk may not result in wildland fires, the additional risk posed by implementation of the TSMP is considered a potentially significant impact requiring mitigation.

It should be noted that the TSMP would be implemented over a long-term planning horizon, and would also accommodate, and be consistent with, the buildout of the Town's General Plan. Ongoing efforts to provide adequate levels of fire protection by the Town and other agencies including the USFS, CDF LVFPD, and MLFPD would help reduce risks associated with wildland fires.

Relevant measures provided in the Town's General Plan that are intended to reduce wildland fire risk include the following:

- S.3.L. Policy: All construction shall comply with wildland fire-safe standards, including standards established for emergency access, signing and building numbering, private water supply reserves available for fire use, and vegetation modification.
- S.3.M. Policy: Involve local fire department in the development review process.
- S.3.N. Policy: Minimize the incidence of fires by supporting the Mammoth Lakes Fire Protection District's (MLFPD) ability to respond to emergencies.
  - S.3.N.1. Action: Assist in establishment and implementation of appropriate funding sources so that the MLFPD is prepared to respond to and mitigate emergencies.
  - S.3.N.2. Action: Update Town-specific policies that further protect people and property from the risks of wildland and structural fire hazards.
- S.3.O. Policy: Support provision of adequate water flow throughout the town and provision of adequate water storage to meet peak fire demand during times of peak domestic demands.
- S.3.P. Policy: Maintain mutual aid agreements with other fire and emergency service agencies.
  - S.3.P.1 Action: Coordinate with other agencies to develop a Fire Hazards Response Plan for the urban-wildland interface.
- S.3.Q. Policy: Support creation and maintenance of firebreaks in coordination with Inyo National Forest and other land management agencies.

Additionally, in response to the 2002 fire season the ESRFSC prepared a handbook called the Fire Safe Plan, which is designed to help east side residents of Inyo and Mono Counties improve their defense against wildland fires. Further, with regard to property maintenance, Section 4291 of the California Public Resource Code (CPRC) requires property owners to reduce fire hazards by removing dead vegetation, creating a ten-foot clearance around propane tanks, removing tree limbs that are within ten feet of the residence, removing leaves and pine needles from roofs and rain gutters, installing a half-inch mesh screen on stovepipes or chimneys, installing spark arresters on all internal combustion engines, and by obtaining burn permits. These requirements serve to minimize risks to people and structures resulting from wildfires that could originate either within or outside the Town's UGB, including areas associated with proposed TSMP facilities.

In conclusion, although the General Plan includes the various measures discussed above in order to address the risk of exposure from wildland fires, and other measures required by ESRFSC and Section 4291 of the CPRC serve to minimize overall wildland fire risks in the Project Area, the incremental increase in trail and other recreational facility use would in turn increase the potential wildland fire risk resulting from the

implementation of the TSMP. As such, this impact is considered potentially significant, and mitigation is provided below to address this impact.

## **(2) Fire Protection Services**

*4.G-2 Implementation of the TSMP would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.*

Development associated with implementation of the proposed project would not result in a notable increase in the quantity of emergency calls received by the MLFPD or other agencies due to increased trail and other recreational facility usage. Although an increase in calls may result in additional strain on the current professional and volunteer staff and require the employment of additional full-time personnel, the nature of the proposed improvements and associated activities they accommodate are not correlated with increased fire protection service demands. Fire protection services and facilities are funded by, among other sources, developer impact fees that provide for additional or expanded facilities, equipment, and staffing. Staffing is estimated based on current service levels and the projected service needs of the Town upon build-out of the General Plan. As noted previously, the Town currently collects between \$745.00 and \$1,561.00 per unit of new residential development and between \$0.99 and \$2.02 per square foot for non-residential uses to fund the required fire suppression equipment: because the increased use of the trails system will principally be a function of broader growth in resident and visitor population, it is expected that staffing and facilities improvements for fire protection will be increased proportionately with that growth. Additionally, the other fire protection agencies that support MLFPD through a mutual aid agreement (i.e., CDF, LVFPD, BFD) also increase their fire protection capabilities commensurate with growth within their jurisdictions, such that their capacity to assist MLFPD during fires and other emergencies is adequately maintained. Since the proposed TSMP improvements would not result in the development of substantial amounts of active urban development, as the vast majority of improvements are trails and related facilities that operate passively, the proposed Project is not expected to result in substantial additional demand for fire protection services. Furthermore, as described above, the Town's General Plan includes a number of policies intended to reduce impacts to fire protection services.

The General Plan contains these Policies to ensure that new development adequately mitigates its impact on fire protection through proper design, materials, adequate water flow, and vegetation management (S.3.L), and adequate facilities and personnel are located in the most efficient locations to facilitate prompt response times (S.3.N). Further, the imposition of the development impact fee (Code Section 15.16.082) also would serve to further ensure that potential impact to fire protection services is reduced for the duration of TSMP implementation. Furthermore, implementation of Mitigation Measure 4.G-1.A, below, would further reduce impacts related to fire protection services.

Based on the above, Project implementation would not require new or physically altered fire protection facilities within the Town or elsewhere. As such, a less than significant impact regarding fire protection services would occur with Project implementation.

### 3. MITIGATION MEASURES

The following mitigation measure is provided in order to reduce risk associated with wildland fires due to increased recreational activities under the TSMP:

**Mitigation Measure 4.G-1.A** As individual projects are implemented under the TSMP, the Town shall undertake actions when applicable to reduce the risk of wildfires. On National Forest lands, these actions shall be coordinated with the USFS to ensure consistency with that agency's standards and guidelines. Specific actions may include but are not limited to : 1) maintain and incorporate design features to facilitate use of MUPs and other facilities, where feasible and appropriate to accommodate emergency vehicles ; 2) provide signage at trail heads and along trails relating to fire prevention (i.e., No Smoking signs, fire danger level signs); 3) provide fuel modification and other fuel treatment applications within Project Areas where appropriate; 4) ensure the maintenance and patrol of trails in the Project Area; and, 5) enforce curfews or other rules to limit unwanted activity in Project Areas during daylight hours and after-hours.

### 4. CUMULATIVE IMPACTS

#### (1) Wildland Fires

*4.G-3 The Project combined with cumulative projects would not increase potential for wildland fires to the demand for fire protection services in the Project Area, or result new or physically altered fire protection facilities. Thus, cumulative wildland fire and fire protection impacts would be less than significant.*

As discussed in Section 3.0, *Basis for Cumulative Analysis*, of this Draft EIR, there are 25 related projects identified in the vicinity of the Project Area, primarily located within the urbanized area of the Town of Mammoth Lakes. Given the geographic distribution and relative distances between these project sites the proposed recreational improvements and their incremental increase in development and population within the Town, the related projects would not increase the potential for wildland fire hazards within the Project Area. Given the passive or low-intensity nature of the majority of proposed Project improvements, the requirement that all development in the Project Area comply with applicable building and fire code requirements, including fuel modification requirements, and given implementation of Mitigation Measure 4.G-1.A, there is little potential for significant cumulative wildland fire impacts. As such, the cumulative wildland fire hazard impact would be less than significant and the Project's contribution to this impact would not be considerable.

#### (2) Fire Protection Services

The related projects, like the proposed Project, would comply with the applicable Town Fire Code and Building Code regulations related to fire safety, access, and fire flow. In addition to site plan review by the MLFPD, the MLFPD reviews Initial Studies and other informational documents for related projects and requires the implementation of mitigation measures, as applicable. The MLFPD has not indicated any deficiencies in the area's fire stations or expansion plans that may occur as a result of growth and new development. Further, the related projects are located within existing, accessible fire service areas; and no

deficiencies in the ability of the current stations to meet projected demand have been identified by the MLFPD. It should also be noted that the related projects would generate revenue to the Town's general fund in the form of net new property tax, direct (i.e., from on-site commercial uses) and indirect (i.e., from household spending) sales tax, utility user's tax, gross receipts tax, real estate transfer tax on residential initial sales and annual re-sales, and other miscellaneous household-related taxes (e.g., parking fines). This revenue could be used to fund MLFPD expenditures as necessary to offset cumulative impacts to fire protection facilities and services. Since the Project would not result in the construction of land uses that create demands for fire protection services and facilities and the related projects are not anticipated to result in relocation or construction or expansion of new fire facilities, cumulative impacts regarding fire protection services would be less than significant, and the Project's contribution to these impacts would not be considerable.

## **5. LEVEL OF SIGNIFICANCE AFTER MITIGATION**

### **(1) Wildland Fires**

Project implementation would incrementally increase the potential for wildland fires to occur within the Project Area. However, with implementation of Mitigation Measure 4.G-1.A, impacts associated with wildland fire risk would be reduced to a less than significant level.

### **(2) Fire Protection Services**

Project implementation would not notably increase demand for fire protection services within the Project Area. Thus, a less than significant impact relative to fire protection services would occur with Project implementation.