

Final Recommendations to Reduce Wildfire Risk to Existing and Future Development: **Los Angeles County, California**

126

Simi Valley

Thousand Oaks

Santa Clarita

Lancaster

Palmdale

San Gabriel Mountains

2

10066 ft

Los Angeles

El Monte

Ontario

Santa Monica



Lake Forest

Laguna Niguel

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December 2020

ABOUT

Community Planning Assistance for Wildfire Program

The Community Planning Assistance for Wildfire (CPAW) program works with communities to reduce wildfire risks through improved land use planning. The CPAW program is a partnership between Headwaters Economics and Wildfire Planning International. It is funded by grants from the USDA Forest Service and private foundations.

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Fire Hazard Severity Zone map created through Los Angeles County Open Data:
https://public.gis.laCounty.gov/public/rest/services/LACounty_Dynamic/Hazards/MapServer/2
New development in Los Angeles County taken by Wildfire Planning International.

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ACRONYMS

ACWM	Agricultural Commissioner/Weights and Measures
ADU	Accessory Dwelling Units
AHMP	All Hazard Mitigation Plan
CAL FIRE	California Department of Forestry and Fire Protection
CEQA	California Environmental Quality Act
CPAW	Community Planning Assistance for Wildfire
CWPP	Community Wildfire Protection Plan
EIR	Environmental Impact Report
ERB	Environmental Review Board
FHSZ	Fire Hazard Severity Zone
FPD	Fire Prevention Division
FRAP	Fire and Resource Assessment Program
LACFD	Los Angeles County Fire Department
NFPA	National Fire Protection Association
NOP	Notice of Preparation
OPR	Governor's Office of Planning and Research
RPC	Regional Planning Commission
SEATAC	Significant Ecological Areas Technical Advisory Committee
SERA	Sensitive Environmental Resource Area
SMMLCZ	Santa Monica Mountain Local Coastal Zone
USDA	United States Department of Agriculture
VHFHSZ	Very High Fire Hazard Severity Zone
WUI	Wildland-Urban Interface

EXECUTIVE SUMMARY

The County of Los Angeles has a long history of devastating wildfires, recently magnified by the Woolsey Fire (2018) which damaged or destroyed thousands of structures, was responsible for three deaths and multiple injuries, and lead to billions in property losses. An After Action Review of the Woolsey Fire Incident made more than 80 recommendations to address issues that arose before, during, and after the Woolsey Fire—some of which included recommendations for improved approaches to land use activities.

The Woolsey Fire served as a catalyst for the County’s Board of Supervisors to draft a motion to prepare and submit amendments to Los Angeles County Code Title 21 (Subdivisions Code) and 22 (Planning and Zoning Code) intended to reduce damage to life and property from wildfires. That motion, which was unanimously approved in February 2020, adopted the After Action Review and also supported the County’s application to the Community Planning Assistance for Wildfire (CPAW, pronounced “SEE-PAW”) program on behalf of the unincorporated areas of Los Angeles County.

CPAW is a national program that provides communities with expertise from professional land use planners, foresters, and fire behavior specialists to recommend improvements to local policies and codes. The program is funded by the USDA Forest Service and private foundations, and implementation of any recommendations is voluntary and at the discretion of the local authority.

Through its participation in the program, the CPAW team worked with staff from the Los Angeles County Department of Regional Planning (Department of Regional Planning) and the County of Los Angeles Fire Department (Fire Department) to understand local challenges and opportunities related to development in wildfire-prone areas. This report is the culmination of the County’s engagement in the CPAW process during 2020. Recommendations for the unincorporated areas of Los Angeles County are summarized below and explained in greater detail in Part 2 of this report. Recommendations primarily focus on land use related activities to reduce wildfire risk through improvements to Title 21 (Subdivisions Code), which reflects the County’s requested assistance in their program application. Additional recommendations to Title 22, the General Plan, and other wildfire risk reduction activities have been provided to support a comprehensive approach toward land use planning for wildfire hazards.

TABLE 1. SUMMARY OF RECOMMENDATIONS

Recommendation	Why This Matters	Key Points
1. Improve Application Review Process	Separate but concurrent processes occur related to development application approvals in the Fire Hazard Severity Zone (FHSZ). Gaps in timing, communication, and coordination across different departments or committees do not always result in a streamlined process that ensures wildfire risk reduction is incorporated at the most effective stage.	<ul style="list-style-type: none">• Update processes to uniformly reference the FHSZs.• Incorporate defensible space requirements during the Subdivision Committee review.

TABLE 1. SUMMARY OF RECOMMENDATIONS

Recommendation	Why This Matters	Key Points
2. Strengthen Fire Hazard Severity Zone Development Conditions	A decision support process that provides guidance to staff on identifying development conditions can help determine the number of units and lots that are appropriate for approval in the FHSZ.	<ul style="list-style-type: none"> Develop guidance on the ability to provide adequate defensible space, minimum fire flow and minimum access requirements after mitigating conflicts with any constraints identified through the California Environmental Quality Act (CEQA), Environmental Review Board (ERB) and Significant Ecological Areas Technical Advisory Committee (SEATAC) processes.
3. Update Titles 21 and 22	<p>Updates to Titles 21 and 22 can better integrate the evaluation of fire risk factors into the County's existing zoning and subdivision standards and review and approval process, improve the clarity and objectivity of fire risk evaluation criteria, and the potential for development of new primary dwelling units and related ADUs in the VHFHSZ.</p> <p>In addition, revisions to the rebuilding allowances can address concerns related to replacement of dwelling units and other structures in a VHFHSZ that may perpetuate risks and increase the likelihood of future structure losses.</p>	<ul style="list-style-type: none"> Clarify the number of lots that can be located on a single point of access, assuming that both primary dwelling units and ADUs may be created on those lots. Prohibit the construction of new dwelling units in the VHFHSZ. Implement additional modifications to lot and lot access requirements. Make additional edits to better integrate fire risk into existing standards and procedures similar to those used for other key planning and safety considerations. Narrow the conditions for reconstruction of single-family dwellings and non-residential structures in the FHSZ. Require that any rebuilding of structures in the FHSZ begin within three years after the damage.
4. Update Policy Guidance	Policies in the General Plan should be strengthened to better reflect the increased importance of wildfire safety and to lay a strong foundation for future changes to Titles 21 and 22 as recommended in this report.	<ul style="list-style-type: none"> Strengthen wildfire policies in the Safety Element to meet the intent of the County's Motion passed on February 11, 2020 (Title 21 and 22 - Reduce Damage to Life and Property from Wildfires). Ensure that development applications that result in an increase in density and/or intensity within the VHFHSZ will not be permitted.

TABLE 1. SUMMARY OF RECOMMENDATIONS

Recommendation	Why This Matters	Key Points
5. Increase Community Fire Adaptation Tools	CPAW recommendations for Los Angeles County primarily focus on improvements to the regulatory process that will apply to future development or rebuilds in FHSZs. However, other existing areas of the County are still at risk and can be addressed through voluntary programs and other incentives.	<ul style="list-style-type: none">• Consider development and implementation of community fire adaptation tools, such as supporting the implementation of a low-cost retrofit program, local community wildfire protection plans (CWPPs), and increased outreach to promote engagement in national voluntary programs that increase and incentivize resident participation in wildfire mitigation.

PART 1. OVERVIEW

Since its founding in 2015, the national Community Planning Assistance for Wildfire (CPAW) program has assisted dozens of communities across the U.S. in reducing wildfire risk by providing technical land use planning assistance. The program is funded by the U.S. Forest Service and private foundations, which allows communities to participate in the program and receive assistance at no direct cost. CPAW teams bring expertise in planning, forestry, wildfire hazard, and other related skills and provide a final set of recommendations for voluntary implementation by each jurisdiction receiving assistance.

The County of Los Angeles was selected as one of six communities to receive technical assistance by the CPAW program in 2020. The scope of CPAW's assistance focused on reviewing relevant titles of the Los Angeles County Code (Subdivisions, Zoning, Fire Code) and making recommendations to minimize wildfire risks to current and future homes and other development in areas designated as a FHSZ. Application and participation in the CPAW program were supported by the Los Angeles County Board of Supervisors who approved a Motion in February 2020 (Title 21 and 22 – Reduce Damage to Life and Property from Wildfires) that calls for the development of land use solutions that reduce the economic, air quality, and health impacts from wildfires by limiting new development within areas of extreme fire risk.

This report delivers recommendations that reflect close engagement with staff from the Department of Regional Planning and Fire Department who served as the primary points of contact. The CPAW process included a kick-off site visit to view local conditions and meet with County staff, research, and follow-up teleconferences to discuss technical questions and findings. Part 1 provides an overview of the community context relevant to the CPAW process to better understand the County's wildland-urban interface (WUI), wildfire hazard, and development. Part 2 provides five recommendations to support wildfire risk reduction in the unincorporated areas of Los Angeles County. These recommendations are primarily intended for implementation by the Regional Planning Department and Fire Department but acknowledge there are many important agencies that play a role in managing the WUI.



Figure 1. In February 2020, members of the CPAW team met with Los Angeles County Regional Planning and Fire Department staff to discuss development in fire-prone areas.

Community Context

The land area of Unincorporated Los Angeles County is 2,600 square miles (1.7 million acres)¹, and includes a diverse range of landscapes, geographic features, and communities. Factors such as key demographic information, housing trends, and the fire environment are helpful to consider for understanding and planning the WUI.

Key Demographic Information & Housing Trends

Between 2000 and 2018, the total population of Unincorporated Los Angeles County increased by 71,112 people to its current population of 1,057,162.² Unincorporated Los Angeles County's population is approximately 10% of the County's total population of 10,283,729. A majority of the population in Unincorporated Los Angeles County is Hispanic (59%), followed by Non-Hispanic White (19%), Non-Hispanic Asian (13%), Non-Hispanic Black (8%). All other Non-Hispanic populations total less than 2%.³ Table 2 summarizes additional demographic and housing information.

TABLE 2. Demographic Information in Unincorporated Los Angeles County	
Category	Statistic
Total Population	1,057,162 people
Population Density	401 persons per square mile
Median Age	34.6 years
Number of Households (occupied housing units)	294,730 households
Average Household Size	3.5 persons per household
Number of Housing Units	311,650 units
Homeownership Rate	60.7% ownership
Median Existing Home Sales	\$625,000
Total Number of Jobs	269,902 jobs
<i>Source: Southern California Association of Governments (SCAG). 2019.</i>	

The most common housing type in Unincorporated Los Angeles County is single-family detached (71 percent). The number of residential units permitted in 2018 in Unincorporated Los Angeles County was 693. By contrast, the highest number of permits issued since 2000 was 3,444 (in 2004). While the number of permits per 1,000 residents has decreased from 3.4 in 2000 to 0.7 in 2018, the number of accessory dwelling units (ADUs) has significantly increased and continues to increase. In 2019, the County approved 932 ADUs, a sharp rise from the 63 ADUs approved in 2016. Also worth noting is the age of existing housing stock—89 percent of the County's housing stock was built before 1990, which pre-dates many wildfire mitigation requirements for subdivisions and structures.

¹ County of Los Angeles General Plan

² Southern California Association of Governments (SCAG). 2019. Profile of Unincorporated Los Angeles County. Available at <https://scag.ca.gov/data-tools-local-profiles>

³ Ibid.

Fire Environment

The Los Angeles County landscape, characterized by chaparral vegetation and rugged topography and coupled with consistent autumn fire weather conditions, is conducive to frequent and large wildfire events. This is reflected in the County's wildfire history.

Prior to 1884, when the first post-wildfire flood impacts were experienced, wildfires were not considered a significant threat in Los Angeles County.⁴ With the steady increase of human activity on the landscape, the impacts of wildfire on human development, activities, and public safety have also steadily grown since these first noted impacts in the 1800's. Over this period, the County has experienced several fires that are notorious for various reasons. Up until the 2018 Paradise Fire, the County's Griffith Park Fire of 1933 was California's deadliest wildfire and the third deadliest firefighter tragedy in U.S. history. It still remains the deadliest fire in Los Angeles County history. At 160,577 acres, the 2009 Station Fire holds the record for the County's largest fire. The most recent notable fire (prior to the 2020 fire season), and Los Angeles County's most destructive fire, is the 2018 Woolsey Fire. The Woolsey Fire spread from Ventura County into Los Angeles County, burning 96,949 acres and resulting in three human fatalities, the evacuation of over 250,000 people, the destruction of 1,121 residential and commercial structures, and an additional 189 miscellaneous structures in Los Angeles County alone. The financial impact of the Woolsey Fire includes \$52 million in fire suppression costs and an estimated \$3 to \$5 billion in insurable losses⁶.

In recent years, homes in Los Angeles County have been threatened or destroyed by wildfire on at least an annual basis, and commonly multiple times per year.⁵ The Woolsey Fire Incident After Action Review notes the contributing factors to the fire threat and outcome include: increased population growth in fire hazard areas, climatic cycles in and out of drought, disease and pest infestation, the cumulative effect of repetitive fires, an associated invasive species growth, and aging utility infrastructures.⁶ The report also notes that analysis of California's historical fires indicates a disturbing trend of an increasing concentration of record-breaking wildfires compressed into the most recent few years of an otherwise 150-year history of wildfire impacts on human development.

Determining Wildfire Hazard within Los Angeles County

Los Angeles County currently relies on the 2007 California Department of Forestry and Fire Protection (CAL FIRE) Wildfire Hazard Severity Assessment that was developed by the Fire and Resource Assessment Program (FRAP). According to the CAL FIRE⁷ FRAP project website and associated literature, the project uses the following criteria:

- **Defining Fuel Hazard** - Fire behavior potential of the wildland fuel, given average bad fire weather conditions.
- **Probability of Burning** - Vegetative fuel condition, weather, ignition source, fire suppression response, and other factors based on historical data between 1950 and 1997.
- **Defining the Urban-Interface** - Structure density of 1 house per 40 acres, or denser, as calculated from the 1990 census block data.

⁴ Los Angeles Almanac <http://www.laalmanac.com/fire/fi07.php>, accessed May 22, 2020

⁵ Final Motion: Title 21 and 22 - Reduce Damage to Life and Property from Wildfires, Supervisor Sheila Kuehl

⁶ County of Los Angeles After Action Review of the Woolsey Fire Incident, November 17, 2019

⁷ Fire Hazard Severity Zone Re-Mapping Project <https://frap.fire.ca.gov/>

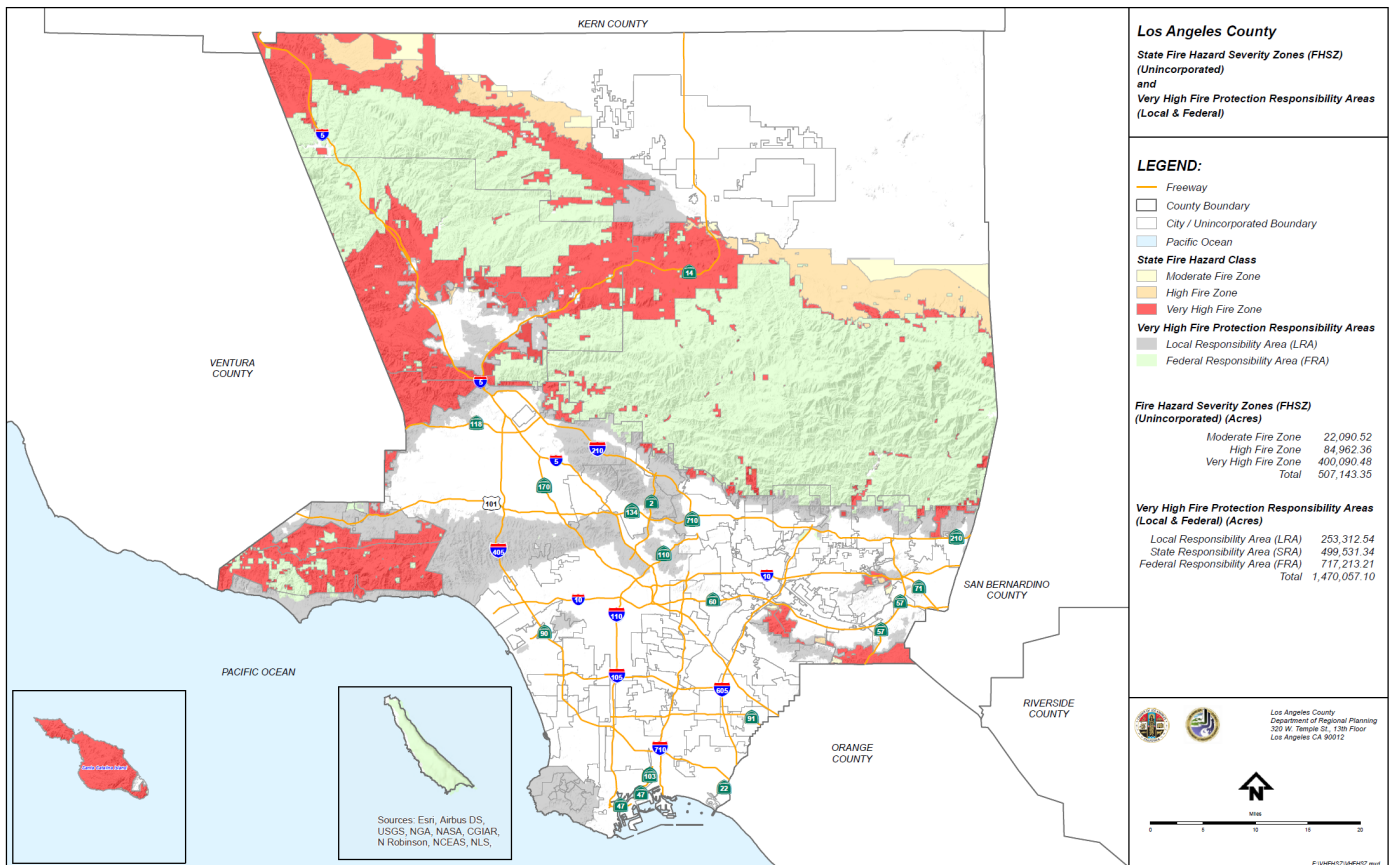
- **Assessing Fire Threat** - Numerical rating based on hazard rank and probability.
- **Identifying Fire Threatened Wildland-Interface Areas** - All areas within 1.5 miles of a fire threat.

As a final output, the FRAP project produces the following three Fire Hazard Severity Zones:

- Moderate
- High
- Very High

CAL FIRE is updating the FRAP Fire Hazard Severity Assessment Process and expects to have draft outputs completed within the next few years.

Both the Department of Regional Planning and Fire Department have policies and development requirements for lands that fall within either the “Very High” or “High” FHSZ classification, which inclusively covers just over 500,000 acres, or 67 percent of the unincorporated land area within County land use planning responsibility (Figure 2).



Development Review and Approval Roles and Responsibilities

Roles and responsibilities among County departments, commissions, and advisory bodies related to the development review and approval process are complex. With regard to wildfire, the relationships and interactions within and between the Department of Regional Planning, Los Angeles County Regional Planning Commission (Regional Planning Commission), Fire Department, Public Works, and various advisory bodies, are important to understand and are summarized below.

Department of Regional Planning

The Department of Regional Planning provides staff advice and assistance to the Regional Planning Commission. The Department of Regional Planning also provides Hearing Officers to review cases of limited complexity, such as minor subdivisions. The Hearing Officers are experienced staff appointed by the Director of Regional Planning and approved by the Los Angeles County Board of Supervisors (Board of Supervisors). The Hearing Officers hold regular hearings on discretionary, non-legislative development cases. Their decisions are subject to appeal to the Regional Planning Commission. In addition to these functions, the Department of Regional Planning handles inspection and code enforcement, and long-range planning.

Regional Planning Commission

The Regional Planning Commission (RPC) acts as an advisory body to the Board of Supervisors on all planning and land use matters and administers the provisions of the State Planning Law (Title 7, Division I, of the Government Code), State Subdivision Map Act, California Environmental Quality Act (CEQA), and Los Angeles County Code of Ordinances affecting planning, such as the County Zoning Ordinance and Subdivision Ordinance. The RPC formulates planning policies and conducts regular public hearings. The RPC consists of five commissioners. They are appointed to four-year terms by the Board of Supervisors. In addition, representatives from the Fire Department Land Development Unit Representative and Public Works attend Regional Planning Commission meetings. Representatives from the County of Los Angeles Department of Parks and Recreation (Department of Parks and Recreation), and Agricultural Commissioner/ Weights and Measures (ACWM) will also attend, if requested.

Environmental Review Board

The Environmental Review Board (ERB) was established as part of the Santa Monica Mountain Local Coastal Program to undertake environmental reviews within the jurisdiction of the Santa Monica Mountain Local Coastal Zone (SMMLCZ). The ERB consists of expert members who are appointed by the Director of Regional Planning to review impacts of proposed development within or in proximity to Sensitive Environmental Resource Areas of the SMMLCZ. The Forestry Division represents the Fire Department on the ERB.

Subdivision Committee

The Subdivision Committee reviews proposed projects, offers counseling on applications, and makes recommendations of conditions, should a case be approved for the County. The Committee is comprised of representatives from the following County Departments: Regional Planning, Public Works, Forester and Fire Warden (Fire Department Land Development Unit Representative), Health Services, and Parks and Recreation. The Subdivision Committee's review is technical in nature and does not fully address whether a project should be approved. The Subdivision Committee meets on a weekly basis and will hear cases approximately four weeks after they are filed.

Significant Ecological Areas Technical Advisory Committee

Certain projects located within County Significant Ecological Areas (SEAs) are regulated by a Conditional Use Permit and subject to Significant Ecological Areas Technical Advisory Committee (SEATAC) review. The SEA Ordinance establishes the permitting, design standards, and review process for development within SEAs, balancing preservation of the County's natural biodiversity with private property rights. The SEATAC review occurs prior to project design. After the project is submitted to the County, the staff biologist reviews the project and accompanying biota report for compatibility with SEA resources in order to make a recommendation to SEATAC. SEATAC reviews projects and the staff biologist's recommendations with the option to concur with or revise the staff biologist's recommendations or directs the applicant to address resource impact issues. Upon a resource consistency determination, projects are able to proceed with the application process. SEATAC's resource consistency determination is relayed through the staff analysis to the Regional Planning Commission for their consideration. SEA policy and development standards are intended to preserve oak trees and other plant species, and commonly affect where appropriate defensible space can be located.

Fire Department

The Fire Department is under the command of the Fire Chief. There are two Chief Deputies who report to the Fire Chief: the Chief Deputy of Business Operations and the Chief Deputy of Emergency Operations. The Prevention Services Bureau falls within Business Operations and is under the command of a Deputy Chief.

Fire Prevention Division

The Fire Prevention Division is under command of an Assistant Chief and is within the Prevention Services Bureau. The Assistant Fire Chief in charge of the Fire Prevention Division is also designated as the Department's Fire Marshal.

Land Development Unit: The Land Development Unit is within the Fire Prevention Division and is responsible for setting Fire Department conditions, specifically with regard to water and access, on every land development issue within Los Angeles County. The Land Development Unit also undertakes plan review for tract and parcel maps, EIRs, Conditional Use Permits, zone changes, variances, street vacations, speed hump proposals, traffic calming plans, and provide requirements and staffing for the Land Development Division of the County's Public Works Department. The Land Development Unit issues final approval for all subdivision matters on behalf of the Fire Department. Finally, the Land Development Unit maintains the Department's "Strip Maps," which identify all past and present subdivisions and all new hydrant locations countywide. As a general practice, the Land Development Unit engages the Forestry Division in all land development that occurs within VHFHSZs.

Forestry Division

The Forestry Division is also within the Prevention Services Bureau under the command of an Assistant Chief and is comprised of three sections: Operations, Natural Resources, and Brush Clearance. The Forestry Division is represented on the ERB. The Forestry Division is responsible for the review of environmental documents related to development and protection of oak tree resources, development of vegetation management plans and proposals, coordination of wildland fire planning, enforcement of the Department's brush clearance program, and review of fuel modification plans. In addition, the Forestry Division staffs five Forestry units, located across Los Angeles County. The five Forestry units are located in Malibu, Saugus, Lake Hughes, San Dimas, and at Henninger Flats in the foothills above Altadena.

Fuel Modification Unit: The Fuel Modification Unit is responsible for the approval of a landscape plan for structures located in the FHSZ. The approval process consists of reviewing structure location and type of construction, topography, slope, amount and arrangement of vegetation, environmental constraints and overall site settings. The objective, through this approval plan process, is to create defensible space necessary for effective fire protection of homes in the FHSZ.

Brush Clearance Unit: The Brush Clearance Unit enforces the Fire Codes Fire Code related to brush clearance on improved parcels, provides annual brush clearance training, and coordinates inspections and compliance efforts with fire station personnel, and provides annual brush clearance training to fire station personnel. The Brush Clearance Program is a joint effort between the County of Los Angeles Fire Department and the County of Los Angeles ACWM Weed Abatement Division. This unified enforcement legally declares both improved and unimproved properties a public nuisance, and where necessary, requires the clearance of hazardous vegetation. These measures create “Defensible Space” for effective fire protection of life, property and the environment.

Department of Public Works

The Land Development Division of Public Works is responsible for advising, supporting, or implementing the design, construction, operation, and maintenance of roads, traffic signals, street lighting, bridges, hydrology, sewers, flood control, water supply and building permitting. Public Works also reviews traffic studies, serves as the County Engineer, and sits on the Subdivision Review Committee.

Agriculture Commissioner/Weights and Measures

The ACWM Weed Abatement Division works closely with the Fire Department Forestry Division in enforcing defensible space on private properties. The ACWM is primarily responsible for enforcing the management of hazardous vegetation on unimproved private property. The ACWM will attend the RPC meetings upon request.

Department of Parks and Recreation

The Department of Parks and Recreation owns and/or operates more than 70,000 acres of local and regional parkland, and a system of multi-use trails. Some development applications may involve the need to consider changes or impacts to existing park facilities, or the development of new park facilities. The Planning and Development Agency of the Department of Parks and Recreation will attend the RPC meetings upon request.

Development Approval Process

The subdivision review and approval process is triggered when a proponent submits a Tentative Tract Map, or Tentative Parcel Map application. The Tentative Tract Map is required for major subdivisions (greater than four parcels) and the Tentative Parcel Map is required for subdivisions consisting of four or fewer parcels of land (minor subdivisions), or condominium units, as determined by the State Subdivision Map Act.

Tentative Tract Maps (Major Land Divisions)

Tentative Tract Maps are reviewed by the Subdivision Committee. Any unresolved issues are usually worked out at this stage. This may require more than one meeting. Upon completion of Environmental Review and Subdivision Committee proceedings, the case is then set for public hearing before the Hearing Officer or Regional Planning Commission, concurrent with other cases if appropriate.

Tentative Parcel Maps (Minor Land Divisions)

A Tentative Parcel Map is required for a subdivision consisting of four or fewer parcels of land or condominium units as determined by the State Subdivision Map Act. For minor subdivisions, the Hearing Officer will make its recommendations to the Director of Regional Planning. The Director of Regional Planning then approves or disapproves the Tentative Parcel Map. For all other types of parcel maps, the Hearing Officer will submit their approval (or denial) to the Director of Regional Planning. If the project is considered controversial, it may appear before the Regional Planning Commission. The applicant can submit an appeal to the Regional Planning Commission regarding a Director's decision (or part of the decision) on Minor Land Divisions. The appeal must be submitted within 10 days of the action. In all other cases, the interested party may appeal the Regional Planning Commission's decision to the Board of Supervisors within 10 days of the action by the Commission. The Final Map may be prepared by the applicant if the Tentative Parcel Map is approved. Any necessary improvement bonding should be completed between the subdivider and appropriate departments. Once all conditions of the interested departments have been met, the County Engineer (Public Works) approves and records the Final Parcel Map.

Environmental Impact Report

The need for an CEQA analysis for projects in Los Angeles County is typically triggered when the County determines that a further analysis of the following elements is appropriate: Land Use, Public Services, Geotechnical, Flood Hazard, Fire Hazard, Noise, Water Quality, Air Quality, Biota, Hazardous Materials, Cultural Resources, Aesthetics, Traffic, Sewage, and Fire and Police Services. After determining that a CEQA analysis should be prepared, the County sends a Notice of Preparation (NOP) to each responsible agency that is involved. This triggers a process that may involve local agencies, state agencies, and the public, with required timelines that may affect the timelines for development review. Upon completion of these review periods, the final CEQA analysis is then sent to the Regional Planning Commission and Board of Supervisors and other appropriate decision-making agencies for certification that the document is complete and in compliance with CEQA and the state and county guidelines. If the project requires discretionary approvals from a state agency, the notice will be sent to the Governor's Office of Planning and Research (OPR) after which, a 30-day statute of limitations on court challenges to the project approval under CEQA. The outcome of the CEQA process can influence all aspects of fire protection and mitigation requirements associated with a proposed development.

Summary

Many of the above processes are undertaken independently of one other and can potentially occur on different timelines. According to County staff, the application process is tracked through the Epic LA plan checking and data processing system. Staff also indicated that some of these processes are also undertaken concurrently and feed into a final decision by the Regional Planning Commission; however, no documentation exists that explicitly describes the relationship of these independent processes to one another. Some of these processes are coordinated, while others occur under a less formal system. Due to the many moving parts of the application review process, the overall timeline does not necessarily align to maximize the appropriate opportunities for when wildfire mitigation decisions could be taken into account. In addition, more consistent documentation tied to the decision-making process would benefit subsequent stages of the review process to inform decision-makers about recommended approvals and denials.

PART 2. RECOMMENDATIONS

In Part 2, CPAW provides five recommendations to the County of Los Angeles that reduce risk to people and property by: improving the application review process; formalizing a decision support process for FHSZ development conditions; updating Titles 21 and 22, which includes revising rebuilding allowances; updating policy guidance, and; increasing community fire adaptation through additional incentives and program tools.

There are several important notes that are applicable to all recommendations that readers should keep in mind:

In general, these recommendations apply to *any* FHSZ, as opposed to distinguishing between the Very High, High, or Moderate classifications within a FHSZ. This approach is based on the history of wildfires in the County—which have often affected areas outside of VHFHSZs—and the anticipated continued changes to fire behavior based on current and future climate conditions. Those recommendations that specifically identify the VHFHSZ reflect situations where existing requirements or policies required distinctions between different FHSZs to be carried forward.

Further, these recommendations reflect the fact that *any* structure is at risk of wildfire—and may contribute to the spread of wildfire—regardless of whether it is classified as a single-family dwelling, an accessory dwelling unit, or another type of structure. These recommendations are intended to significantly mitigate wildfire risk if fully implemented, but even the most robust mitigation measures cannot guarantee the safety of any additional dwelling or structure in any FHSZ. While it is the developer’s responsibility to mitigate risk to the extent as required by law, full compliance with those legal requirements or the recommendations in this report does not guarantee structure survival or that all risk is eliminated when developing in a FHSZ.

1. Improve Application Review Process

This recommendation focuses on improving the application review process through streamlining and better coordination to address specific wildfire risk reduction improvements.

Development Application and Review Process Summary

As discussed in Part 1, there are potentially four separate, but concurrent, complex processes that can influence the wildfire risk conditions required as part of the development review, approval, and on-site requirements. These processes are undertaken by a minimum of five separate divisions or units and three separate committees that are managed under three distinctly separate County departments, in addition to any other outside agency involvement that is required as part of ERB review (for areas within the SMMLCZ), SEATAC review, or CEQA processes.

Additionally, most of these processes operate on independent and largely uncoordinated timeframes with respect to achieving successful wildfire risk reduction objectives. This unintentionally creates “silos” of parallel, but independent, sub-processes with multiple levels of duplication that can potentially impact the efficiencies and effectiveness of each other. Table 3 outlines the primary processes, tasks, and responsible departments associated with development application and review and includes comments on the process.

TABLE 3. SUMMARY OF DEVELOPMENT AND REVIEW PROCESSES, TASKS AND DEPARTMENTAL RESPONSIBILITIES

Process	Associated Tasks	Responsible Department(s)	Comments
1. Tentative Tract Map and Tentative Parcel Map Approval Process	<ul style="list-style-type: none"> Environmental Impact Reports (EIR) SEATAC Review for SEAs ERB Review for SERAs (within SMMLCZ) 	<ul style="list-style-type: none"> Regional Planning Department Public Works - Development Services Fire Department - Forestry Division is the lead on EIR, SEATAC and ERB review. The Fire Department-Land Development Unit (LDU) is involved in the review process. 	<ul style="list-style-type: none"> Both the Tentative Tract Map and the Tentative Parcel Map are reviewed by the Subdivision Committee EIR findings, ERB and SEATAC recommendations are submitted to the Regional Planning Commission, but it is unclear if they are reviewed by the Subdivision Committee.
2. Access Planning and Implementation	<ul style="list-style-type: none"> Subdivision Access Parcel Access 	<ul style="list-style-type: none"> Fire Department - Land Development Unit Regional Planning Department Public Works - Development Services 	<ul style="list-style-type: none"> Access requirements are completed prior to and independent of defensible space requirements. In unincorporated areas, parcels one acre or larger require structures to be setback 30' from property lines. Parcels less than one acre shall provide for the same practical effect (referenced in 14 CCR 1276.01 Setback for Structure Defensible Space).
3. Building Permit	<ul style="list-style-type: none"> Fuel Modification Plan/ Defensible Space Fire Flow Access 	<ul style="list-style-type: none"> Fire Department - Fuel Modification Unit and Land Development Unit Public Works - Development Services 	<ul style="list-style-type: none"> Fuel Modification Unit - Defensible Space requirements are associated with individual lot building permits after EIR, SEATAC, and all subdivision requirements have been completed.
4. Enforcement/ Maintenance	<ul style="list-style-type: none"> Brush Clearance Program 	<ul style="list-style-type: none"> Fire Department - Brush Clearance Unit 	<ul style="list-style-type: none"> Brush Clearance Unit - Brush maintenance The Los Angeles County Fire Code: Section 325 drives the brush clearance process. Only ACWM is involved as a joint brush clearance enforcement agency. Supporting codes are PRC 4290 and 4291, and Health and Safety Code 13879 and 14875-14922.

Improve Development Review Process

According to staff, a specific development review process is followed in most cases; however, it is not documented in a format where the process and timelines are clearly described to external users and is not necessarily apparent for even some internal staff. The CPAW Team recommends that the Regional Planning Department coordinate with the Fire Department and Public Works to formalize and document the timing and process regarding tasks involved in each sub-process of the application review process for all Tentative Tract Map and Tentative Parcel Map applications that are located within a FHSZ. Specifically, we recommend the following changes to the process:

1. Change all County processes and documentation to reference “Fire Hazard Severity Zones” instead of differentiating between “Very High Fire Hazard Severity Zones” and other “Fire Hazard Severity Zones” to align with current and recommended policy and regulatory practice and application.
2. Determine if CEQA, ERB (SMMLCZ), or SEATAC review is triggered.
3. If the CEQA, ERB, and SEATAC processes are triggered, complete these processes prior to Subdivision Committee technical discussions.
4. Include wildland fire ecology and natural disturbance as part of decision support with regard to the CEQA, ERB, SEATAC, and defensible space outcomes. Consider adding fire ecology and wildland fire behavior expertise to SEATAC.
5. Consider CEQA, ERB, SEATAC, and defensible space recommendations and requirements as part of the Subdivision Committee technical review and recommendations.
6. Formalize and document the requirements for the Land Development Unit to engage the Forestry Division for all residential development reviews occurring in a FHSZ.
7. Require the applicant to provide a proposed building envelope or “pad” location and/or “exclusion” areas based on the CEQA, ERB, SEATAC, and defensible space outcomes early in the process.
8. Consider a requirement to review *all* residential landscape plans in *all* FHSZs.

2. Strengthen Fire Hazard Severity Zones Development Conditions

A transparent, formalized decision support process that provides guidance to staff and applicants on identifying development conditions can help determine the number of units and lots that are appropriate for approval in the FHSZ. We recommend limiting the number of units and lots in *all* FHSZs based on the following set of conditions:

1. The ability to achieve an approved Fuel Modification Plan, including adequate defensible space in accordance with Title 32 (Fire Code), to address local potential wildfire impact for all potential structures after mitigating conflicts with all constraints identified in the CEQA, ERB, and SEATAC processes.
2. The ability to provide minimum fire flow water supply in accordance with Title 32 (Fire Code) and Title 20 (Utilities) to the subdivision after mitigating conflicts with all constraints identified in the CEQA, ERB, and SEATAC processes.
3. The ability to provide minimum access requirements as identified in Title 32 (Fire Code).
4. The ability to meet Title 21 (Subdivisions) requirements after mitigating conflicts with all constraints identified in the CEQA, ERB, and SEATAC processes.

3. Update Titles 21 and 22

CPAW's assistance for the County primarily focused on the need for updates to Title 21 (Subdivisions) of the County Code based on the County's interests expressed in its program application. As a result, this recommendation lists numerous changes to Title 21 that could reduce the risk of personal injury or property damage in the FHSZ. However, this recommendation also identifies a broad change to Title 22 (Planning and Zoning) that could further reduce these risks.

Title 21 (Subdivisions)

Title 21 contains Los Angeles County's subdivision regulations. We recommend the following updates and changes to those regulations to (a) better integrate evaluation of fire risk factors into the County's existing subdivision review and approval process, (b) improve the clarity and objectivity of fire risk evaluation criteria, and (c) address questions and potential risks that arise because of the State of California's recent legislation limiting local government authorities regarding ADUs. This section focuses first on three very important areas of change, followed by minor edits that could raise wildfire safety concerns to the same levels of attention given to other environmental and development factors in Title 21.

3.1 Revise the Number of Lots that Can be Located on a Single Point of Access

Los Angeles County's current subdivision regulations limit the number of lots that can be located on a single point of access. These regulations were established to control the number of County residents who may be placed at risk and who may need to evacuate the area if a public emergency occurs, and to limit the number of structures that may be destroyed and the risks to firefighters created in defending those structures (even if they are vacant at the time). This is particularly important in limiting the development of new primary dwelling units in FHSZs. Recent California legislation permitting up to two ADUs on many single-family lots significantly increases the existing risks by increasing the potential number of County residents that may be at risk when wildfire emergencies occur. In short, any increase in occupancy in FHSZs creates significant additional risk, regardless of whether occupancy occurs in primary dwelling units or ADUs.

While the County's recent ADU ordinance amends Title 22 (Zoning) to prohibit new ADUs on lots in the VHFHSZ that do not have two independent points of access, they do not (a) limit the creation of new developable lots in the VHFHSZ, or (b) extend those limitations to all FHSZs. In addition, while the ADU ordinance amendments to Title 22 affect how ADUs can be created on existing single and multi-family residential lots, they do not address whether the likely increased occupancy of those lots should influence the County's willingness to create new residential lots in FHSZs. We recommend that Title 21 be revised to reflect the increased risks to public safety that come with the creation of new residential lots and the likely increased occupancy of those lots by reducing the number of residential lots that can be located on a single point of access. Doing so would significantly reduce the risks to human life, the difficulty of evacuating residents in case of wildfire, and the number of structures that need to be defended when wildfires occur in the future.

To implement these changes, we recommend the following:

- **Section 21.08. Definitions**

Add a definition of Fire Hazard Severity Zone as follows: "Fire Hazard Severity Zone (FHSZ) shall include all wildfire hazard severity zones designated by the Director or the Board of Forestry and Fire Protection, and shall include any additional lands designated as a FHSZ by the County."

- **Section 21.24.010. General requirements – determination of adequacy**

Add a third and fourth sentences reading: "All streets shall comply with Section 325.10 of the Los Angeles County Code. Each access route to a highway which is shown on the Highway Plan from or through a FHSZ shall also be adequate to accommodate safe and timely access by fire apparatus and other emergency equipment."

- **Section 21.24.020. Restricted residential access**

Revise subsection A to read: "If a street or street system is restricted to a single access route to a highway shown on the Highway Plan (except for a limited secondary highway), which is maintained and open to public travel, whether at the point of intersection with the highway or at some point distant from the highway, the street or street system shall serve not more than:

- 150 dwelling units or 50 residential lots, whichever is less, where the restriction is designed to be permanent and the street or street system ~~does not traverse a wildland area which is subject to hazard from brush or forest fire~~ is not located in and does not pass through a FHSZ.
- 75 dwelling units or 25 residential lots, whichever is less, where the restriction is designed to be permanent and the street or street system ~~traverses a wildland area which is subject to hazard from brush or forest fire~~ is located in or passes through a FHSZ.
- 300 dwelling units or 100 residential lots, whichever is less, where the restriction is subject to removal through future development.

Revise the second sentence of Subsection B to read: "If the roadway paving on that portion of the street or street system forming the restriction is 64 feet or more in width, is not located in and does not pass through a FHSZ, and the restriction is subject to removal through future development, the permitted number of dwelling units may be increased to 600 and the permitted number of residential lots may be increased to 200, whichever is less."

- **Section 21.24.030 Wildland access**

Revise to read: "Notwithstanding the provisions of Sections 21.24.020 and 21.24.190, the advisory agency:

- A. shall disapprove a design of a division of land in an VHFHSZ which utilizes a cul-de-sac or branching street system or other single-access street or street system as the sole or principal means of access to lots within the division, and
- B. may disapprove a design of a division of land in a FHSZ other than a VHFHSZ which utilizes a cul-de-sac or branching street system or other single-access street or street system as the sole or principal means of access to lots within the division, where the forester and fire warden advises:

- a. That the street or street system ~~will traverse a wildland area which is subject to extreme hazard from brush or forest fires~~ is located in or passes through a FHSZ; or
- b. That the lack of a second route of access would unduly hinder public evacuation and the deployment of fire-fighting apparatus and other emergency equipment in the event of a brush or forest fire."

- **Section 21.24.040 - Modifications to access and frontage requirements**

Revise to add a second sentence reading: "No modification that would allow an increase in the number of lots or dwelling units in a FHSZ shall be approved."

- **21.40.040 - Contents-information and documents required**

Revise item A.12 to read: "The proposed use of the property, including the number of dwelling units contained in each of the following:

- a. Detached single-family residences;
- b. Attached single-family residences (townhouses), two-family residences and/or apartment houses containing fewer than five dwelling units;
- c. Apartment houses containing five or more dwelling units; ~~and~~
- d. Mobile homes."

3.2 Other Modifications to Access Requirements

- **Section 21.24.090 - Right-of-way and roadway width requirements-cross-section diagrams**

Add a new Subsection C.6 to read: "C. The cross-sections designated as "alternate" in the diagrams following this section shall apply to existing improved streets only if the advisory agency finds that:

6. The alternate cross-section will not be located in or pass through a FHSZ."

- **Section 21.24.100 - Street grades**

Revise to read: "No highway or street shall have a grade of more than six percent, except for short stretches where the topography makes it impracticable to keep within such grade. In no event shall the grade of a highway or street that is located in or passes through a FHSZ exceed eight percent. Where the street or highway is not located in and does not pass through a FHSZ, and in no event shall the grade exceed 10 percent except where evidence, which is satisfactory to the advisory agency, is given that a lower grade is not possible."

- **Section 21.24.220 Fire-fighting access**

Revise the second sentence to read: "Where the design of a division of land will cause an existing fire road or fire break to be severed, and the forester and fire warden advises that this condition will impair the provision of adequate fire protection, the advisory agency ~~may~~ shall require that the subdivider either revise the design of the division of land so that the fire road or fire break will not be severed or provide an alternate easement."

- **Section 21.28.060 - Private and future streets**

Revise to read: "Except as set out hereinafter, all parcels of land intended for public use in a division of land shown on the final map or parcel map thereof, shall be

offered for dedication for public use. However, with the approval of the advisory agency, any road that is not located in and does not pass through a FHSZ and which is intended to be kept physically closed to public travel or posted as a private street at all times may be shown as a private street; but in any such case, the final map or parcel map shall contain a conditional offer of dedication, or the map may be accompanied by a conditional offer of dedication by separate instrument, either of which may be accepted by the board of supervisors. Any such private street shall be shown on such map by heavy dashed lines."

- **Section 21.32.060 - Minor land divisions–Five-acre minimum lot size requirement**

Revise Subsection C to read: "On all parcel maps of five-acre lot size or more, the following note shall be placed:

"Further division of this property to lot sizes below five acres will require standard improvements be completed as a condition of approval. The improvements will include but not be limited to providing access (including access for fire-fighting apparatus and other public safety equipment), installation of water mains, appurtenances and fire hydrants, and conformance to standard Los Angeles County development standards."

- **21.40.120 - Access to property**

Revise to read: "The advisory agency may require as a condition of approval of a tentative map that the subdivider produce evidence that the property as divided will have access to a public street or highway, including without limitation adequate access for fire-fighting equipment."

- **21.48.100 - Access to property**

Revise to read: "The advisory agency may require as a condition of approval of a tentative minor land division map that the subdivider produce evidence that the property as divided will have access to a public street or highway, including but not limited to adequate access for fire-fighting apparatus and other public safety equipment."

3.3 Lot Requirements

- **Section 21.24.250 - Area and width–Sloping terrain**

Add a fifth Subsection A by adding a fifth criteria reading: In lieu of compliance with subsection A of Section 21.24.240, the plan of subdivision may comply with the requirements of Section 21.24.260 if the advisory agency determines:

"5. That each lot having a reduced area and located in or adjacent to a FHSZ shall have adequate area to provide setbacks and buffers necessary to avoid any increase in risk of injury or property loss through wildfire."

- **Section 21.24.320 - Flag lots**

Revise the first sentence to read: "The advisory agency may disapprove the platting of flag lots where this design is not justified by topographic conditions or the size and shape of the division of land, ~~or~~ where this design is in conflict with the pattern of neighborhood development, or where any portion of the proposed flag lot is located in a FHSZ."

Revise the fourth sentence to read: “Each access strip shall be located so that, when improved as a driveway, the finished grade will not exceed 20 percent, and shall comply with all applicable requirements of Title 32 of this code.”

- **Section 21.24.400 - Division of land adjacent to existing roads**

Revise to read: “If the advisory agency finds that the proposed division of land abuts an existing road which has improvements insufficient for the general use of the lot owners in the division of land and local neighborhood and drainage needs, it may disapprove the design of the division unless the subdivider improves or agrees to improve such road to the same standards required of roads within all divisions of land by Chapter 21.32. If the advisory agency finds that the proposed division of land is located in a VHFHSZ, it shall deny the proposed subdivision.”

- **Section 21.32.050 - Minor land divisions–Requirements**

Revise to read: “Improvements shall not be required as a condition precedent to filing a parcel map on a minor land division where the advisory agency finds that the existing systems and improvements adequately serve adjacent developed parcels, unless such improvements are necessary for the development of parcels within the division of land or are necessary for the prevention of increased wildfire risk to the subject property or neighboring properties, or are necessary to be consistent with the general plan.”

3.4 Additional Minor Edits to Better Integrate Fire Risk into Existing Standards and Procedures

Additional minor edits to Chapter 21 to better integrate fire risk into existing standards and procedures include but are not limited to the following changes:

- **Section 21.12.040. Report of recommendations to advisory agency**

Revise to read: “The subdivision committee shall report in writing its recommendations to the advisory agency. If any portion of the subdivision is in a FHSZ, the recommendations shall affirmatively state that the application complies with all applicable County and state standards related to wildfire prevention and safety, or if not, what actions the applicant has committed to incorporate to mitigate any risks to public safety or property occurring due to the failure of the application to comply with any such County and state standard.”

- **Section 21.16.015 - Building location and access restrictions–exhibit map**

Revise introductory text to read: “A tentative map submitted pursuant to Chapter 21.40 for any portion of a condominium project, a community apartment project, ~~or a~~ lease project, or a project in which a portion of the land is located in a FHSZ, shall be accompanied by an exhibit map, unless the project requires a conditional use permit which is processed prior to or concurrently with the tentative map and which addresses the location of buildings and access thereto on the project site.”

Revise Subsection A to read: “The exhibit map shall be submitted to the satisfaction of the Director of Regional Planning and shall depict, but shall not be limited to, the location and dimensions of all FHSZ areas, structures, buildings, yards, walls, fences, vehicle and bicycle parking and loading facilities, the vehicular, bicycle, and pedestrian access to the proposed structures, buildings, and parking and loading facilities, and the location and design of pedestrian roadway crossings (i.e., crosswalks).”

Revise Subsection H.3 to read: “Notwithstanding subsection C, an exhibit map amended to modify setbacks may include conditions applicable to such modification, including without limitation conditions to reduce wildfire in the FHSZ.”

Revise Subsection H.5 to read: “An amendment to the exhibit map shall not be permitted if the proposed change(s) may result in a significant adverse environmental impact not addressed in the environmental document approved for the project or may increase risk of injury or property loss through wildfire in the FHSZ.”

- **Section 21.24.350 - Residential subdivisions–Provision or local park sites**

Revise final sentence to read: “If the advisory agency determines that park space should be provided, the advisory agency shall advise the subdivider of the design and location of such space, including but not limited to the potential for the park space to provide additional protection from wildfire and the need to avoid park locations and designs that may increase the risk of injury or property loss from wildfire.”

- **Section 21.24.370 - Divisions of land for purpose of lease only**

Add a new Subsection A.1.c to read: “A. The advisory agency may approve a tentative map of a division of land which does not comply in all respects with the requirements of Parts 1, 2 and 3 of this chapter if:

1. The advisory agency finds:

c. The proposed design and access to the proposed development provides at least the same level of protection against wildfire risk as if the application complied with Parts 1, 2, and 3 of this Chapter.”

- **Section 21.24.380 - Condominiums and community apartment projects**

Add a new Subsection B.1.d to read: “B. Pedestrian access into or through the project area shall comply with the following:

1. When serving residential uses:

d. If any portion of the land is located in a FHSZ, the proposed design and access to the proposed development (i) does not allow for increased occupancy of the land beyond that which would be permitted if the application complied with parts 1, 2, and 3 of this Chapter, and (ii) provides at least the same level of protection against wildfire risk as if the application complied with Parts 1, 2, and 3 of this Chapter.”

- **Section 21.24.390 – Mobile home divisions of land**

Add a new Subsection A.1.c to read: “A. The advisory agency may approve a tentative map of a division of land which does not comply in all respects with the requirements of Parts 1, 2 and 3 of this chapter if:

1. The advisory agency finds:

c. If any portion of the land is located in a FHSZ, the proposed design and access to the proposed development (i) does not allow for increased occupancy of the land beyond that which would be permitted if the application complied with parts 1, 2, and 3 of this Chapter, and (ii) provides at least the same level of protection against wildfire risk as if the application complied with Parts 1, 2, and 3 of this Chapter.”

- **Section 21.32.040 - Lot sizes in excess of 10 acres–Requirements**

Revise Subsection B to read: “Where each parcel resulting from a division of land has a minimum gross area of 10 acres or is a quarter-quarter-quarter section, resulting from the normal division of an undersized section of land and having a minimum gross area of nine acres, and the entire division of land is zoned A-1, A-2 or D-2 by Title 22 of this code, streets or highways which traverse sloping terrain shall be graded in accordance with engineering plans approved by the road commissioner (and by the fire warden if the property or access to the lot is located in, or the access to the lot passes through, a FHSZ), unless all lots abutting any such street or highway are within an area zoned to have a required area of 10 acres or more by the Zoning Ordinance as set out at Title 22 of this code. No other improvements shall be required.”

- **Section 21.32.110 - Water mains, appurtenances and fire hydrants**

Revise and reformat Subsection A to read: “The subdivider shall install, or agree to install, water mains and fire hydrants adequate for the domestic demands and general use of the lot owners and for fire protection to the division of land. This section shall not apply where:

1. All lots on the division of land map contain a minimum gross area of five acres, and
2. All lots on the division of land map are located outside of a FHSZ, and
3. The area is within a single-family residential or agricultural zone, or within a desert-mountain zone and used for residential or agricultural purposes.”

- **Section 21.32.160 - Street tree planting**

Revise to read: “Except as otherwise provided in this section, a subdivider shall plant trees along the frontage of all lots shown on a final map or parcel map. The number, species, and location of such trees shall be as specified by the Director of Public Works, or if the property is located in a FHSZ, then by the Director of Public Works in consultation with the Fire Department. Tree planting is not required unless it is determined by the advisory agency to be in the public interest:

- A. Along a segment of a street or highway to which the right of direct access from abutting lots has been relinquished; and
- B. Along streets and highways which are not improved with curbs.”

- **Section 21.32.195 - On-site trees**

Revise subsection A to read: “Planting Requirement. In addition to the requirements of Section 21.32.160, the subdivider shall plant or cause to be planted within the front yard one tree for each 25 feet of street frontage for each parcel created by a residential division of land as a condition of approval; provided, however, that this requirement shall only apply to lots in the FHSZ if approved by the Fire Department.”

- **Section 21.40.040 - Contents–Information and documents required**

Revise Subsection A.10 to read: “The tentative map shall show and contain, or be accompanied by, the following as an aid to the advisory agency in its consideration of the design of the division of land:

10. Source of water supply for on-site use and fire protection, if any;”

Add a new Subsection A.28 reading: “28. All areas in FHSZ or other state or local government maps of wildfire risk areas.”

- **Section 21.44.320 - Land subject to flood hazard, inundation, or geological hazard**

Revise section title to include “wildfire hazard.”

Revise Subsection A to read: “If any portion of the land within the boundaries shown on a tentative map of a division of land is subject to flood hazard, inundation, a FHSZ, or geological hazard, and the probable use of the property will require structures thereon, the advisory agency may disapprove the map or that portion of the map so affected and require protective improvements to be constructed as a condition precedent to approval of the map.”

Revise Subsection C to read: “If any portion of a lot or parcel of a division of land is subject to flood hazard, inundation, a FHSZ, or geological hazard, such fact and portion shall be clearly shown on the final map or parcel map by a prominent note on each sheet of such map whereon any such portion is shown. A dedication of building restriction rights over the flood hazard, inundation, a FHSZ, or geological hazard area may be required.”

- **Section 21.48.040 - Information required – format**

Add a new Subsection R reading: “The tentative minor land division map shall be a reproducible print, legibly drawn to a scale of sufficient size to show full detail, including the following information:

R: The boundaries of any FHSZ on or adjacent to the property.”

- **Section 21.48.050 - Written statements required**

Add new Subsections A.11 and A.12 reading: “The subdivider shall submit with the tentative minor land division map a written statement containing the following information:

11. A confirmation that no portion of the property is located in a VHFHSZ; and

12. “If any portion of the property is located in an FHSZ other than a VHFHSZ and the fire warden so requests a statement as to how setbacks, buffers, fuels management, or other measures will mitigate risks of injury or property loss through wildfire, and how such measures will be made binding on future owners of the property.”

- **Section 21.48.110 - Criteria for rejection**

Revise to read: “The advisory agency may reject a tentative minor land division map if the only practical use which can be made of the division, as proposed, is a use prohibited by any ordinance, statute, law or other valid regulation or would increase risks of injury or property on the subject property or abutting properties in a FHSZ.”

- **Section 21.48.140 - Eligibility for waiver—Certain uses or conditions of property**

Revise Subsections A.1 and A.3 to read: “A. The following minor land divisions shall be eligible for waiver of the requirement that a parcel map be filed:

1. Those in which each resultant parcel is a part of one or more lots shown on a final map, parcel map or approved record of survey map, and the area of each resultant parcel is more than 20 percent of the total area of the lot or lots of which it is a part, except where the tentative map of any such division, the conditions of approval

thereof or the requirements of the Subdivision Map Act or of this Title 21 provide for or require the delineation of flood or geological hazard, FHSZ areas, or building restrictions;”

and

“3. Those of a lease-project, except where the tentative map of any such division, the conditions of approval thereof or the requirements of the Subdivision Map Act or of this title provide for or require the delineation of flood or geological hazards, FHSZ areas, or building restrictions;”

- **Section 21.48.170 - Procedures–Action by advisory agency**

Revise Subsection A.2. to read: “A. 20 days after acceptance of a request for waiver, or within such additional time as may be necessary, the advisory agency shall waive the requirement that a parcel map be filed as provided in Sections 21.48.130 and 21.48.140, if it finds:

2. That the proposed minor land division complies with all applicable requirements as to area, improvement and design, flood and water drainage control, appropriate improved public roads, sanitary disposal facilities, water supply availability, environmental protection, avoidance or mitigation of wildfire risk, and other requirements of the Subdivision Map Act and of this Title 21.”

- **Section 21.52.010 - Modification or waiver of provisions authorized when**

Add a new Subsection E reading: “No modification shall have the effect of increasing development of new primary or accessory dwelling units in a FHSZ.”

- **Section 21.60.030 - Certificate of compliance–For undersized parcels**

Revise Subsection A.6 to read: “Review by the director, pursuant to the provisions of Part 12 of Chapter 22.56, to determine satisfaction of the following criteria:

6. The parcel of land has adequate fire flow, and hydrant spacing, and access for fire-fighting equipment as required by Section 20.16.060, and”

Title 22 (Planning and Zoning)

The provisions of Title 22 should be revised to support the proposed changes to Title 21, and to further reduce the risks of personal injury and property damage in FHSZs in a number of ways. Most importantly, some of the regulations related to evaluation and reduction of fire risk in the SMMCZ could be broadened to apply more generally to FHSZs throughout the County. More specifically, those portions of Sections 22.44.2050 through 22.44.2102 related to fire hazards could be (a) broadened to apply to FHSZs (rather than just VHFHSZs) in the Santa Monica Mountain Local Implementation Program, and (b) similar provisions could be added to Section 22 Division 5 (Special Management Areas) or Division 6 (Development Standards) making the SMMCZ fire hazard regulations generally applicable throughout all the FHSZ.

One example of possible text to achieve that result is shown below:

Wildfire Hazards Evaluation and Mitigation

A. Purpose and Applicability

These standards are established to protect public health and safety by reducing and mitigating hazards associated with wildfire that could affect development proposals in

the Fire Hazard Severity Zone (FHSZ). The provisions apply to all lands in the FHSZ unless otherwise provided in the County Code or state law.

B. Uses

Property in the FHSZ may be used for any permitted use subject to the same limitations and conditions of the underlying zone, if consistent with these provisions, as well as all other applicable provisions of the County Code and state law.

C. Consultation and Plan Preparation

1. The applicant shall consult with Public Works and the Fire Department regarding, but not be limited to, an evaluation of slope, aspect, fire topography, fire history/potential, habitat, adjacent properties (existing structures, fuel modification, habitat, parkland status), existing vegetation, fuel modification, type of plants to be planted on site, fire hydrant locations and fire flows, and access standards (e.g., width, grade, slope, paving, overhead clearance).
2. After consulting with Public Works and the Fire Department, the applicant shall prepare all necessary plans, including but not limited to a site plan for the proposed project that includes all mitigation measures necessary to comply with the recommendations and requirements of those agencies. The site plan shall show all aspects of development including, but not limited to, grading, construction of retaining walls or flood control devices, fuel modification areas, accessways, water lines, and irrigation systems necessary to mitigate any hazards on the property.

D. Required Findings and Analysis

1. Written findings of fact, analysis and conclusions addressing fire hazards must be included in support of all approvals, denials or conditional approvals of development located on a site. Such findings shall address the specific project impacts relative to the applicable development standards identified in Subsection E below. The findings shall explain the basis for the conclusions and decisions of the County and shall be supported by substantial evidence in the record. Approval for the proposed development shall only be granted if the County's decision-making body is able to find that:
 - a. The project, as proposed, will be designed to minimize fire hazards due to project design, location on the site or other reasons.
 - b. The project, as conditioned, will not have significant adverse impacts on fire hazards due to required project modifications, landscaping or other conditions.
2. If found to be necessary to conform to the development standards in Subsection E below or other provision of the County Code, the proposed development shall be modified, by special condition, relative to height, size, design, or location on the site and may be required to incorporate other methods to avoid or minimize fire hazards. If special conditions of approval are required to bring the project into conformance, the findings shall explain how the special condition(s) alleviate or mitigate the adverse effects that have been identified.

E. Development Standards

1. All new development shall be sized, sited, and designed to minimize risks to life and property from fire hazard, considering changes to fire risk caused by increasing global temperatures.

2. In addition, all new development shall comply with the following requirements:
 - a. New development shall be required to use design and construction techniques and materials that minimize risks to life and property from fire hazard. Structures shall be constructed with appropriate features and building materials, including but not limited to fire-resistant exterior materials, windows and roofing; and eaves and vents that resist the intrusion of flame and burning embers. Development sites and structures shall be located off ridgelines and other dangerous topographic features such as chimneys, steep draws, and saddles.
 - b. New development shall incorporate fuel modification and brush clearance techniques and shall be designed and carried out to minimize clearance of natural vegetation and reduce impacts to sensitive natural habitat to the maximum extent feasible.
 - c. New development shall provide for emergency vehicle access and adequate fire-flow water supply in compliance with applicable fire safety regulations. Development in areas with insufficient access, water pressure, fire flows, or other accepted means for adequate fire protection shall be prohibited.
 - d. Prior to development approval, all new development shall demonstrate the availability of an adequate water supply for fire protection in compliance with applicable fire safety regulations. Where feasible, alternative water resources for fire-fighting purposes shall be maintained on development sites. Water tanks shall be sized consistent with County minimum requirements and clustered with approved structures.
 - e. Residential structures shall be clustered to provide for more localized and effective fire protection measures such as consolidation of required fuel modification and brush clearance, fire break maintenance, firefighting equipment access, and water service. Structures shall also be located along a certified all-weather accessible road, which in some cases may consist of permeable surfaces, in a manner that provides firefighters adequate vehicle turnaround space on private properties. Where feasible, new development shall be accessed from existing roads.
3. Should the Fire Department policies regarding fuel management and fire protection conflict with the policies and provisions of the LUP, personnel from the Fire and Regional Planning Departments shall meet and agree on measures to balance the need for fire protection for structures with the need to protect environmental resources. If resolution of issues cannot be achieved the Los Angeles County Fire Code and/or the State Fire Code shall take precedence, whichever is more restrictive.
4. As a condition of approval of new development within or adjacent to an area subject to high wildfire hazards, prior to development approval, the property owner shall be required to submit a signed document that shall indemnify and hold harmless the County, its officers, agents, and employees against any and all claims, demands, damages, costs, and expenses of liability arising out of the acquisition, design, construction, operation, maintenance, existence, or failure of the permitted project in an FHSZ.

Revise Rebuilding Allowances

After a wildfire occurs, the County permits homes and other structures to be rebuilt regardless of whether the property is located in a FHSZ. Some homes located in a FHSZ have been rebuilt more than twice following different wildfire events. More specifically, at least three provisions of the Title 22 address the ability to rebuild homes after a wildfire, and a fourth has been interpreted by staff to provide a similar allowance. In addition, two of these provisions do not include any limitations on the ability to rebuild non-residential structures (such as equestrian centers or wedding venues), even though their reconstruction could result in increased activity in FHSZs and increased needs for adequate evacuation routes when a wildfire occurs.

- Chapter 22.44.820(A)(5) applies within the Santa Monica Mountains Local Coastal Program area and includes the following text:

“The replacement of any structure, other than a public works facility, destroyed by a disaster. The replacement structure shall conform to applicable existing zoning requirements; shall be for the same use as the destroyed structure, shall not exceed either the floor area, height or bulk of the destroyed structure by more than 10 percent; and shall be sited in the same location on the affected property as the destroyed structure.”
- Chapter 22.252 (Woolsey Fire Disaster Recovery) allows rebuilding and further allows homes to be constructed 10 percent larger than the home that was damaged or destroyed. 22.252.060(B) includes the following provision:

“Structures irreparably damaged or destroyed by the Woolsey Fire will be reconstructed as a like-for-like replacement and shall not exceed either the floor area, height, or bulk of the destroyed structure by more than 10 percent;”
- Chapter 22.102.040(G) addresses Significant Ecological Areas (“SEAs”) and exempts “[t]he rebuilding and replacement of legally built structures which have been damaged or partially destroyed and will not increase the previously existing development footprint” from SEA regulations.
- While Chapter 22.174 does not explicitly exempt replacement housing after a wildfire from the requirement to obtain an Oak Tree Permit, staff has interpreted the text similarly to Chapter 22.102.040(G). If oak trees surrounding a damaged house did not burn, and the replacement house is no larger than the damaged house, staff does not require the applicant to obtain an Oak Tree Permit.

Only two of these provisions do not allow replacement homes to be larger than those they replace. For example, an applicant seeking to replace a home damaged by wildfire with one that is up to 10 percent larger would need to obtain an SEA Conditional Use Permit, and if the house encroached on existing protected oak trees, an Oak Tree Permit would also be required. While the desire to allow County residents to rebuild their homes is understandable, this practice tends to perpetuate, rather than reduce, the number of homes located in FHSZs. Given the County’s desire to reduce risks to human life and the amount of property damage caused by wildfire events, it is not clear why the construction of a larger replacement home in the FHSZ should be permitted. It is also not clear why the right to rebuild should not include a time limit, as is often the case with replacement of nonconforming uses and structures in many communities.

To address the additional risks created by the 10 percent expansion allowance, Los Angeles County should revise the text of Chapters 22.44.820(A)(5) and 22.252 by removing the words “by no more than 10 percent” from both provisions. It should also clarify that all provisions that allow rebuilding of structures in FHSZs apply to both structures that were conforming and to those that were nonconforming on the date when the damage occurred.

As an alternative that would address this additional risk in more detail, and to further address the risk of open-ended rights to rebuild in the FHSZ, the County could also consider adopting the following provisions:

1. If a single-family dwelling is located in a FHSZ, or is located on a lot with a single means of access that is located in or passes through a FHSZ, and the dwelling unit is later destroyed by fire to the extent that the estimated cost of rebuilding the dwelling exceeds 50 percent of the assessed value of that structure as shown in the assessor’s records, then the single-family dwelling may only be reconstructed or replaced if all of the following conditions are met:
 - a. A building permit for the reconstruction or replacement of the dwelling is obtained within three years of the date of destruction; and
 - b. The maximum size of the reconstructed or replacement single-family dwelling does not exceed the legally established size of the single-family dwelling that existed before destruction or 800 square feet, whichever is smaller; and
 - c. The dwelling unit is reconstructed or replaced:
 - i. On the existing foundation for the destroyed dwelling unit, if one remains; or
 - ii. In the same location as the foundation that existed before destruction; or
 - iii. In a location on the lot that places the dwelling unit outside of a FHSZ or further from potential future wildfire, geological, and environmental hazards than the prior location, as determined by the Director of Regional Planning, County Engineer, and Fire Marshal.
2. If a legally constructed primary non-residential structure is located in a FHSZ, or is located on a lot with a single means of access that is located in or passes through a FHSZ, and the non-residential structure is later destroyed by fire to the extent that the estimated cost of rebuilding the structure exceeds 50 percent of the assessed value of that structure as shown in the assessor’s records, then the structure may only be reconstructed or replaced if all of the following conditions are met:
 - a. A building permit for the reconstruction or replacement of the structure is obtained within three years of the date of destruction; and
 - b. The maximum size of the reconstructed or replacement structure does not exceed the size of the structure that existed before destruction; and
 - c. The structure is reconstructed or replaced:
 - i. On the existing foundation for the destroyed structure, if one remains; or
 - ii. In the same location as the foundation that existed before destruction; or
 - iii. In a location on the lot that places the structure outside of a FHSZ or further from potential future wildfire, geological, and environmental hazards than the prior location, as determined by the Director of Regional Planning, County Engineer, and Fire Marshal; and

- d. The Director of Regional Planning and Fire Marshal determine that the authorized use and occupancy of the structure will not result in a material increase in congestion on evacuation routes from the lot in the event of a wildfire emergency.

The above strengthened restrictions on rebuilding in FHSZs should apply to both buildings that were conforming and those that were nonconforming before the damage occurred. More specifically, the above propose regulations should be made an exception to the County's general regulations on rebuilding nonconforming structures in Chapter 22.174(G). That could be done by adding a new subsection reading "The lot containing the structure that was damaged or partially destroyed is not located in a FHSZ; and" and then renumbering existing subsections G.1 and 2 to G.2 and G.3.

4. Update Policy Guidance

California's cities and counties are required by state legislation to adopt a General Plan, which includes a requirement to address hazards. Specific to wildfire, the General Plan must meet state planning requirements established in Government Code §65302 (g)(3).

Existing Policies

The Los Angeles County General Plan (adopted in 2015) addresses wildfire and other natural hazards in several chapters:

- **Land Use** identifies Special Management Areas, such as the Very High Fire Hazard Severity Zones (VHFHSZ), Flood Hazard Zones, Seismic and Geotechnical Hazard Zones, Open Space Areas, National Forests, and Significant Ecological Areas and Coastal Resource Areas, which may require additional development regulations to protect resources and minimize the impacts of hazards.
- **Conservation and Natural Resources** contains goals and policies for scenic resource protection and hillside management that consider fire, flood, erosion, and landslides.
- **Safety Element** provides background information on wildfire in the County, an overview of fire-related land use and building regulations in the County Code, and goals and policies to prevent or reduce the potential risk of death, injuries, and economic damage.

Strengthening Policies

Some County policies discourage development activities in fire hazard severity zones, such as those under Safety Element Goal S 3, which calls for "an effective regulatory system that prevents or minimizes personal injury, loss of life, and property damage due to fire hazards." Policies include:

Policy S 3.1: Discourage high density and intensity development in VHFHSZs.

Policy S 3.7: Site and design developments located within FHSZs, such as in areas located near ridgelines and on hilltops, in a sensitive manner to reduce the wildfire risk.

However, the existing policy language leaves a lot of room for interpretation in terms of how policies will be achieved through the regulatory process. We recommend amending applicable policies to clearly state that the County will no longer support discretionary decisions that allow for an increase in density or intensity in the VHFHSZ. Further, we recommend clarifying existing policies on the FHSZ and adding a new policy related to redevelopment, as follows.

Policy S 3.1 (recommended update): Prevent putting additional people and property at risk to wildfire in the VHFHSZ by no longer allowing development applications that result in an increase in density and/or intensity in VHFHSZs.

Policy S 3.4 (recommended update): Reduce the risk of wildland fire hazards in all FHSZs through the use, implementation, and enforcement of regulations and performance standards, such as fire resistant building materials, vegetation management, fuel modification and other fire hazard reduction programs.

Policy S 3.13 (new policy): Update requirements for the reconstruction of single-family dwelling units and other structures in FHSZs to reduce future risks and impacts.

Amending the General Plan with these policy revisions accomplishes several objectives:

- 1) Ensures consistency between the General Plan, Subdivision and Zoning regulations, and implementation of future revisions as recommended by CPAW in this report. In other words, several of CPAW's recommendations are intended to limit the number of people in harm's way in the VHFHSZ by putting restrictions on future allowances of increased density or intensity (see Recommendation 3).
- 2) Reflects the intent of the Board of Supervisors motion passed on February 11, 2020 (Title 21 and 22 - Reduce Damage to Life and Property from Wildfires) that calls for land use solutions that reduce the economic, air quality, and health impacts from wildfires by limiting new development within areas of extreme fire risk, which may include "an amendment that requires a denial recommendation of plan amendments that increase allowed density/intensity within FHSZs."
- 3) Alleviates confusion or subjectivity in terms of new development decisions required by staff and elected officials. By saying the County will "discourage" development, it remains politically difficult to determine when the County will or will not make these decisions based on the grounds of fire hazard.
- 4) Elevates the importance of wildfire in terms of decision-making on the front end – in other words, this proactive approach reduces the need to figure out ways to mitigate later through a combination of setbacks, vegetation management, and other trade-offs that do not directly correlate to a formula for risk reduction and public safety.

5. Increase Community Fire Adaptation Tools

CPAW recommendations for the County of Los Angeles primarily focus on improvements to the regulatory process that will apply to future development or rebuilds in the FHSZ. Implementing new land use planning and regulatory tools for wildfire requires public engagement to educate the community on why updates are being proposed and facilitate a robust engagement process. In addition, many *existing* subdivisions and homes in the FHSZ may not be adequately prepared for wildfire hazard in terms of their existing development patterns and structural susceptibilities. Some of these challenges, such as limited road width or single-points of access, are cost-prohibitive, politically infeasible, or beyond the County's legal authority to address through the land use planning process. Other opportunities, such as home retrofit programs, provide more feasible solutions but are not under the purview of the Regional Planning or Fire Departments nor is funding currently available.



Figure 3. Existing areas that face challenges such as narrow roads shown above (near Malibu Lake) require additional strategies to plan for wildfire.

Community Fire Adaptation Tools

We recommend that the County increase its community fire adaptation tools to more comprehensively support the implementation of planning activities for existing and future development. These recommendations also align with several goals and policies for fire hazards in the General Plan Safety Element and the Fire Department's 2020 Strategic Fire Plan.

Low-Cost Retrofit Program

Eighty-nine percent of the County's housing stock was built before 1990, resulting in many homes in the FHSZ being constructed before significant building code requirements were in place to reduce structural vulnerabilities to wildfire. A retrofit program that targets existing single-family detached homes in the FHSZ could address these susceptibilities and expand local understanding of other features in the structure ignition zone (e.g., maintenance of decks and removal of combustible materials, such as patio furniture). A retrofit program also implements Policy S 3.8: Support the retrofitting of existing structures in FHSZs to help reduce the risk of structural and human loss due to wildfire.

In 2019, the California State Legislature approved Assembly Bill No. 38⁸ to increase the information provided related to wildfire susceptibility on real estate disclosures and initiate a

⁸ Full text is available at: https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201920200AB38

California Wildfire Mitigation Financial Assistance Program to provide assistance for retrofits and defensible space. Legislative requirements include:

- On or after January 1, 2021, the seller of any real property subject that is located in a high or very high fire hazard severity zone shall provide a disclosure notice to the buyer, if the home was constructed before January 1, 2010, that includes:
 - A statement as follows: “This home is located in a high or very high fire hazard severity zone and this home was built before the implementation of the Wildfire Urban Interface building codes which help to fire harden a home. To better protect your home from wildfire, you might need to consider improvements. Information on fire hardening, including current building standards and information on minimum annual vegetation management standards to protect homes from wildfires, can be obtained on the internet website <http://www.readyforwildfire.org>.”
 - On or after July 1, 2025, a list of low-cost retrofits developed and listed pursuant to Section 51189 of the Government Code. The notice shall disclose which listed retrofits, if any, have been completed during the time that the seller has owned the property.
 - A list of features that may make the home vulnerable to wildfire and flying embers. The notice shall disclose which of the listed features, if any, that exist on the home of which the seller is aware, including: eave, soffit, and roof ventilation where the vents have openings in excess of one-eighth of an inch or are not flame and ember resistant; roof coverings made of untreated wood shingles or shakes; combustible landscaping or other materials within five feet of the home and under the footprint of any attached deck; single pane or nontempered glass windows; loose or missing bird stopping or roof flashing; rain gutters without metal or noncombustible gutter covers.
- The Office of Emergency Services shall enter into a joint powers agreement with the Department of Forestry and Fire Protection to develop and administer a comprehensive wildfire mitigation program. The program will encourage cost-effective structure hardening and retrofitting, facilitate vegetation management, the creation and maintenance of defensible space, and other fuel modification activities that provide neighborhood or communitywide benefits against wildfire.

Potential implications from this legislation include increasing the amount of information that informs buyers about existing homes’ structural vulnerabilities (which may influence housing purchase decisions) and creating more resources to support knowledge and implementation of low-cost retrofits. The County should track retrofit programs and related resources to determine if it can participate and/or use information from the program for a locally-established program.

Community Wildfire Protection Plans

Community Wildfire Protection Plans (CWPPs) provide an opportunity to plan for wildfire hazard and prioritize risk reduction actions through a collaborative and organized process. Currently, the Santa Monica Mountains CWPP (currently undergoing an update) covers a broad area of the Santa Monica Mountains and is focused on the residential areas in both Ventura and Los Angeles Counties—including the Santa Monica Mountains North Area. This CWPP identifies mitigation actions for each planning unit, such as fuel reduction projects, and areas requiring improvements to access and water supply. However, there are no other CWPPs in place at the

local level, which results in a significant portion of Unincorporated Los Angeles County in a FHSZ without a community-driven wildfire plan in place to guide and inspire local engagement.

We recommend the County review areas that are not covered by a CWPP and identify actions to support the future development of community-driven CWPPs in FHSZs. Actions may include collaboration with other entities, such as local Fire Safe Councils, to provide relevant wildfire hazard information (e.g., specialized expertise, local knowledge) and resources that can assist others in CWPP development.

Some communities, such as Humboldt County and Mariposa County, have taken the approach of developing a countywide CWPP that communities can “plug into” as current or future appendices for each local community. Other jurisdictions adopt local CWPPs as part of their Hazard Mitigation Plan (typically also an appendix) or include it by reference in their General Plan.

Ready, Set, Go! and Firewise USA

The County recently released its 2020 Ready, Set, Go! program materials, which provide residents with critical information on creating defensible space, retrofitting with fire-resistant materials, and preparing to safely evacuate ahead of a wildfire. Engagement in the Ready, Set, Go! program can be supported by encouraging participation in other voluntary neighborhood programs, such as NFPA’s Firewise USA®, which teaches people how to adapt to living with wildfire and encourages neighbors to work together and take action to prevent home losses. Nationally, there are over 1,500 recognized Firewise USA® sites. The Departments of Insurance in seven states, including California, have approved filings by USAA to give homeowners insurance discounts to USAA members living in communities recognized by the Firewise USA® program. More information and free resources are available on www.firewise.org.

CWPPs and Firewise USA® activities are recognized by recent legislation as contributing toward fire risk reduction. Assembly Bill No. 1823 *Fire protection: local fire planning*, as approved by Governor Newsom on October 2, 2019, amends Public Resources Code (Section 4290.1)⁹ by requiring that on or before July 1, 2022, the Board of Forestry and Fire Protection shall develop criteria for and maintain a “Fire Risk Reduction Community” list of local agencies located in a State Responsibility Area or a VHFHSZ, identified pursuant to Section 51178 of the Government Code, that meet best practices for local fire planning. Criteria used to develop the Fire Risk Reduction Community list include recently developed or updated CWPPs, adoption of the Board’s recommendations to improve the Safety Element, participation in Fire Adapted Communities and Firewise USA® programs, and compliance with the Board’s minimum fire safety standards.

⁹ Accessible at https://leginfo.ca.gov/faces/billCompareClient.xhtml?bill_id=201920200AB1823.

CONCLUSION

Fire hazard severity zones across Los Angeles County continue to face development pressure to accommodate lifestyle preferences, affordability, or other desires of County residents. However, these same areas have been repeatedly affected by wildfires, many of which have resulted in deadly and damaging outcomes, including loss of life and property. Furthermore, these areas may face significantly higher risks of extreme wildfire activity in the future as a result of climate change.

This CPAW report has recommended changes to key County policies, review procedures, and regulations to achieve a safer and more resilient approach to reducing the risks to human life and property in FHSZs. Although many uncertainties exist related to the Coronavirus pandemic, corresponding budget-related shortfalls, and other social, economic, and environmental challenges, the recommendations in this report do not rely on increased spending for implementation. Rather, these recommendations provide the County with a roadmap to increase efficiencies, improve clarity of decision-making that can be implemented without the creation of new programs, payments, or governmental structures, and that can be complemented by other state and local strategies.



Figure 4. View toward Woolsey Fire burn area from a property site being rebuilt after the fire (image credit: WPI).