

## Attachment C

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### MEMORANDUM



To: Sidnie Olson, Director Community Development  
From: Rusty Goodlive, Fire Marshal  
Date: June 21, 2010  
Re: Ridgewood Village EIR

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The Eureka Fire Department respectfully disagrees with the conclusions of the Ridgewood Village Development Project Draft Environmental Impact Report that, as proposed, Phase 1 and the subsequent phases have “no”, or “less than significant after mitigation”, impacts to Fire Protection.

Additionally, the Eureka Fire Department believes that the report lacks sufficient data to completely evaluate the impacts and that the data that is provided is, in some cases, not correct or misinterpreted.

We will be focusing on five areas:

1. Chapter 2: The Description of the Proposed Project
2. Fire Department Access
3. Water Supply
4. Wildland Urban Interface
5. Impacts on Regional Fire Department Emergency Response Capabilities
6. Other Public Safety Impacts

1. Chapter 2: Description of Proposed Project

The report is designed to describe impacts of both the Phase 1 and subsequent phases. There is incomplete data to review the impacts of the Phase 1 project and much less data to review subsequent phases.

The “Conceptual Master Plan” diagram on the cover sheet, for example, includes a commercial area. Evaluation of water supply, access and other impacts of both Phase 1 and subsequent phases will require details of the commercial area including building occupancy types, construction types and building sizes. Building heights in Phase 1 and subsequent phases are required for evaluation of potential impacts of

water supply, access, fire protection systems, specialized fire equipment and the need for Eureka's aerial ladder truck.

There are two references on the Conceptual Mast Plan diagram to a "Ramp to Garage" with no further details provided. It is important to note that there are several significant fire and life safety Building and Fire Code requirements relative to both parking garages and underground buildings.

## 2. Fire Department Access

There is insufficient data provided to review fire department access issues, particularly in the commercial area. Fire Department access requirements in the California Fire Code include access road width and construction requirements, dead-end turnarounds, load, maximum slope and grade, and maximum distance of buildings to access roads.

The increased trip count and traffic impact fire access to the Ridgewood subdivision itself. Increased traffic will restrict access and increase road closures due to construction, traffic accidents and other incidents. These closures will require travel to alternate access routes impacting response times.

The impact to Fire Department access to the Ridgewood subdivision and project could be partially mitigated by the Fire Access Road provided the road is a public street open for continuous access and it is surfaced with asphalt or concrete meeting construction specifications of the California Fire Code.

There is incomplete data to evaluate access issues within Phase 1 and subsequent phases. The California Fire Code contains requirements for Fire Department access including distance of buildings from access roads, access road width and construction requirements, dead-ends, turnarounds, grade and slope.

After construction, control of the roads and public ways should be transferred to Humboldt County. Appropriate assessments for maintenance should be considered.

## 3. Water Supply

The Humboldt Community Services District found that their infrastructure provides adequate pressures, flows and capacity for Phase 1 and subsequent phases. This would require data on the building size and construction type in the commercial area. If this data was not available to HCSD then the water supply requirements should be re-evaluated. Should any subsequent program driven system improvements be found either within or outside the scope of the program, the developer should be required to make those improvements as necessary.

Inadequate information is supplied to review water supply infrastructure for Phase 1 and the subsequent phases. Figures 2-7 and 2-8 provide limited details of water

service to Phase 1 and 2. There are no diagrams or details of proposed water service to the subsequent phases

Elements of the Phase 1 infrastructure should be designed and installed as they apply to the subsequent commercial and multi-family phases.

After completion of the installation, control of the water infrastructure should be transferred to the Humboldt Community Services District to insure routine testing and maintenance. Appropriate assessments for system maintenance should be considered.

#### 4. Wildland Urban Interface; State Responsibility Area

This project is within State Responsibility Area, Wildland Urbane Interface Moderate Hazard zone. The requirements of Chapter 7A of the California Building Code apply. Cal Fire and other State requirements also apply.

#### 5. Impacts on Regional Fire Department Emergency Response Capabilities

##### A. Fire Apparatus Response Time

Fire incident outcomes are directly related to response times. Successful outcomes depend on both the timely arrival of the first responding unit and the subsequent arrival of the total number of units needed to mitigate the incident. As identified in the City of Eureka's Standards of Response Study, national standards for the arrival of the first arriving fire unit on scene of a fire is four minutes and the balance of response of all units within eight minutes.

Table 10-9 lists increased delays of one to two minutes at key intersections for Phase 1. Table 10-17 lists delays after completion of subsequent phases at many key intersections at more than two minutes.

Impact 11-5 claims there would be "less than significant impact" on fire department response times of Phase 1. This finding, however, uses pre-project response time data which is already greater than the standard. Adding the delay times found in table 10-9 increases those response times to 5½ to 6 minutes for the two closest Humboldt Fire District Engines; times that are significantly above standard. No analysis of the increased response times for the balance of responding units from the greater Eureka area is included.

Delays for the subsequent phases are even more significant as shown in Table 10-17. Delays at many intersections are estimated in excess of two minutes. Increased congestion and more controlled intersection will further increase Fire Department response times. This results in projected response times of first arriving units to 6½ to 8 minutes and even more dramatically increases the response times of the balance of responding units from the greater Eureka area.

We disagree with the reports findings that the impacts of Phase 1 to response times will be “less than significant with the installation of stop signs and other traffic improvements”.

We also disagree with the reports finding that the mitigation of subsequent phases would be achieved by a new fire station alone. Mitigation measures for staffing the fire station will also be required.

The Cutten / Ridgewood community is served by two roads; Elk River Road and Walnut Drive. Fire units routinely response across the Ridgewood subdivision from one side to the other. Delays or closures of either Elk River Road or Walnut Drive would result in significantly delayed response times as Fire units traveled across town to the alternate access route.

If it was paved and open year-around, the proposed Fire Access Road north of the project to Lundblade Drive could partially mitigate the impact to response times and access. On this route, however, apparatus would be responding through the Lundbar Hills subdivision and access the north end of Phase 1 via the proposed Fire Access road. Response time calculations are required to evaluate the impacts of using this route.

The report does not evaluate the impacts of the effects of other fire incidents to response times. The City of Eureka’s Standard of Response Coverage study found that when a fire incident occurs, a second occurs 25% of the time and a third 4.78% of the time. This will result in further increased response times from the closest two Humboldt Fire District station, delays that would be further exacerbated by more remote program related traffic impacts.

The impacts of the response time delays can only be mitigated by constructing, equipping, and staffing a new fire station and apparatus at or in the immediate vicinity of the project.

#### B. Fire Department Staffing

The Eureka Fire Department does not agree that the proposed mitigation of impact 11-5, Phase 1 need for new or expanded fire protection, is to increase the staffing of Humboldt Fire District #1 by .4 ( 4/10’s) Firefighters, and that the proposed mitigation of impact 11-11, fire protection of subsequent phases, is addition of 2 Firefighters. Additionally, the funding sources for the proposed staffing increases were identified as projected increases in property taxes however. The study, however, does not provide supporting data as to the amount of tax revenue the project would generate to Humboldt Fire District #1.

In 2007, the City Contracted with Citygate Associated to conduct a Fire Service Standards of Response study. The study concluded that development outside the current City area will require an additional fire station with funding mechanisms

for on-going staffing. The study was conducted with information available at the time and at best could only have included County planning documents available at the time. An updated study reflecting the increases projected population and traffic impacts associated with the project should be conducted. Regardless, the project should include funding mechanisms for on-going staffing a new fire station with current HFD minimum daily staffing, in addition to the one-time property, construction and equipment costs.

The Fire Department staffing impacts of the project can only be mitigated by a staffing a new fire station and apparatus at or in the immediate vicinity of the project. Humboldt Fire District Fire Engines are currently staffed by at least three Firefighters per day, every day. Mitigation of the staffing impacts of this project should include a mechanism for funding and maintaining three Firefighter daily staffing at the new station.

C. City of Eureka and Community Fire Protection

The City of Eureka participates in an Automatic Aid agreement with Humboldt Fire District #1. The City and District respond their fire units to all fire incidents in the other's jurisdiction. The increased call volume as a result of Phase 1 and subsequent phases impacts the Fire Protection of the City of Eureka and greater Eureka area as fire units will be drawn out of the City more frequently. During these times these units will not be available to respond to other calls, calls that would already be occurring without the development of Phase 1 and subsequent projects.

The impacts to the Fire Protection of the City of Eureka and the greater Eureka area can only be mitigated by constructing, equipping, and staffing a new fire station and apparatus at or in the immediate vicinity of the project.

D. Commitment of Eureka's Aerial Apparatus

In general, Fire Department aerial apparatus are used for buildings with roof heights exceeding the reach of ground ladders and for elevated fire streams. The Eureka Fire Department staffs one aerial apparatus out of its Headquarters fire station. The City of Eureka primarily staffs this apparatus to protect its old town and downtown district, as well as numerous Victorian, commercial and other buildings throughout the City.

Building height and area data for Phase 1 and subsequent phases is needed to evaluate the potential impact on the need for aerial apparatus based on building height. Commercial building size and arrangement designs are needed to evaluate the potential need for aerial firefighting.

An evaluation of the Phase 1 and subsequent phase's impact on the need for aerial apparatus is needed. Impacts to the City of Eureka would have to be mitigated to the City's satisfaction.

#### 6. Other Public Safety Impacts

We are skeptical as to the findings of Impact 10-3 and 10-7 that there is "no impact" from Phase 1 or the subsequent phases in hazards due to design features such as sharp curves and dangerous intersections. The report states that there is no need for a median or left turn lane at Ridgewood Drive and Ridgewood Hills Drive. Ridgewood Drive is a wide two-lane road posted at 45 mile per hour. The entrance to the proposed Ridgewood Hills drive is immediately west of sweeping, limited visibility curve where Walnut Drive transitions into Ridgewood Drive. The trip load on Ridgewood Drive and in and out of Ridgewood Hills Drive suggests an increased hazard due to speed and visibility at the intersection.

The closure of northbound Dolbeer at Harris has public safety impact as Dolbeer is the direct emergency vehicle travel route to St Joseph's Hospital from the Cutten / Ridgewood areas. This route is routinely used by ambulance's, including patients transported from the program development. There is no analysis of the let alone of increased ambulance travel times to the hospital for the current number of ambulance trips and the increased number from the program including the proposed 220 senior housing units.

There are a limited number of ambulances that serve the greater Eureka area. The report did not analyze the impacts of Phase 1 and subsequent phases to ambulance service.

The City of Eureka's Standards of Response Study found that:

"If additional suburban density growth is approved southeast of the current City limits, Maps 3b and 6b clearly show that if good suburban outcomes are to be provided, such as confining the fire to the room of origin and to intervening successfully in cardiac arrest patients, then there is not adequate 4- or 8-minute travel coverage into this area from any of the existing City or District stations. "

The mitigation option provided in the study that addresses the impacts of the development on the Ridgewood community as a whole is to "Require the developer to set aside land and build and equip a fire station, *and* provide a per-parcel assessment to meet the staffing requirements in perpetuity".

The Eureka Fire Department believes that the mitigation proposals in the Ridgewood Village Development Project Draft Environmental Impact Report do not accurately address the impacts to Fire Protection. Among the impacts that are not mitigated are the cumulative impacts of traffic delays. The study does not mitigate the impacts of restricted access to the subdivision. The study does not mitigate increased demand on fire services. And the study does not mitigate the impacts to Fire Protection of the City

of Eureka and the greater Eureka area. Additionally, there is incomplete data to evaluate impacts in areas such as access, water supply, and fire protection requirements.

Note on the 2010 California Building Code:

The 2010 California Building Code, schedule for adoption on January 1<sup>st</sup>, 2011, will require fire sprinklers to be installed in all new residential buildings, including one and two family residences. All residential buildings in the project will be required to be equipped with residential fire sprinkler systems.

Thank you for the opportunity to respond to the EIR. Please contact me if you have any questions.