5.16 FIRE AND LAW ENFORCEMENT SERVICES

This section of the Draft Environmental Impact Report (EIR) describes the potential impacts to fire and law enforcement services from implementation of the Centennial Project.

5.16.1 INTRODUCTION

Purpose

The County of Los Angeles Department of Regional Planning Environmental Checklist Form, which has been prepared pursuant to the California Environmental Quality Act (CEQA), requires that impacts to fire and law enforcement services be evaluated as part of the environmental documentation process. The impacts of the proposed development on the Project site are analyzed at a project-level of detail; direct and indirect impacts are addressed for each threshold criterion for both the on-site and off-site Project features. Growth-inducing impacts and cumulative impacts are described in Sections 6.0 and 7.0, respectively. Analysis of wildfire hazards is discussed in Section 5.3, Hazards and Fire Safety.

Summary

The Project would result in the development of a maximum of 19,333 residential units, generating approximately 57,150 residents, and over 10.0 million square feet of non-residential development that would create approximately 23,675 jobs. This anticipated Project-related growth in population and employment would result in an increase in demand for fire and law enforcement services on the Project site.

Fire Services

Fire services and emergency response for fire incidents during the initial development phases of the Project would be provided from Fire Station 77, located at 46833 Peace Valley Road in Gorman, which is currently staffed with a three-person engine company. This station would serve the Project until such time that the 1,000th dwelling unit is built on the site (at which time the first on-site fire station would be operational) (see MM 16-3).

As shown on Exhibit 4-1, Centennial Project – Conceptual Land Use Plan, the Project includes conceptual site locations for up to four new fire stations on the Project site. In Village 1, one fire station is proposed east of the National Cement Plant Road. The second fire station is proposed in Village 4, and the third fire station is proposed in Village 7, with the location of a potential fourth station to be determined. These new fire stations are projected to provide an average five-minute response time for the first arriving unit for fire and eight minutes for the advanced life support (paramedic) unit on the site at Project buildout. This is consistent with the County of Los Angeles Fire Department's (LACFD's) goals for response times in urban areas. Ultimately, the LACFD would approve the final station site locations, and the Applicant would construct and equip the fire stations (MM 16-3). The LACFD has indicated that the proposed fire stations on the site would provide adequate fire service to the Project.

The Applicant would construct fire protection facilities in accordance with the approved Project, in lieu of paying established developer fees at the time building permits are issued (MMs 16-1 through 16-3). The proposed fire stations on the site would be staffed by a minimum four-person engine company. Implementation of MMs 16-1 through 16-3 would provide for fire station sites, construction of fire station facilities, and funding for fire protection apparatus/equipment to serve the Project. Therefore, impacts on fire services would be reduced to a less than significant level.

Law Enforcement Services

The Project would also result in an increase in the demand for law enforcement services, including those provided by the Los Angeles County Sheriff's Department (Sheriff's Department or LASD) and the California Highway Patrol (CHP). The Project includes the construction of a Sheriff's station on the Project site (in the Business Park area north of State Route [SR] 138). The ultimate location and timing for implementation of this station would be determined by the LASD in coordination with the Project Applicant and would be dependent upon the development rate on the Project site and its location. Prior to development of this permanent Sheriff's station, the LASD would operate out of a "store front" sub-station until the permanent station is required to be developed. This LASD "store front" sub-station would be properly outfitted in accordance with applicable occupancy requirements of the LASD for this type of facility, and would be fully operational prior to the issuance of the first occupancy permit (refer to MMs 16-2 and 16-4) to ensure that response times to the site for emergency and non-emergency calls would be within the County guidelines.

The Applicant may provide the "store front" and/or permanent Sheriff's stations in lieu of part or all the Sheriff Development Impact Fee, as determined appropriate pursuant to Section 22.74.090, "Consideration in Lieu of Fee", of the County Code. The addition of the "store front" and permanent Sheriff's stations, payment of developer fees by the Project Applicant/ Developer, if applicable (refer to MM 16-4) and revenues from taxes generated (for LASD) and vehicle registration fees (for California Highway Patrol [CHP]) would offset increased demands on the LASD and the CHP. Therefore, impacts on law enforcement services would be reduced to a less than significant level.

The analysis in this section focuses on the projected demand for fire and law enforcement services and the facilities necessary to meet this demand. The physical environmental impacts related to the implementation of necessary fire and law enforcement infrastructure are addressed as part of the Project analysis provided throughout this EIR.

Section Format

As described in Section 5.0, Environmental Setting, Impacts, and Mitigation, and in accordance with State CEQA Guidelines Article 9 (Contents of Environmental Impact Reports), each topical environmental analysis includes a description of the existing setting; identification of thresholds of significance; analysis of potential project effects and identification of significant impacts; identification of a mitigation program, if required, to reduce the impacts; and level of significance after mitigation. This information is presented

in the following format (Please refer to Section 2.0, Introduction, and Section 5.0 for descriptions of each of these topics):

- Introduction
 - o Purpose
 - Summary
 - Section Format
 - o References
- Fire Services
 - o Relevant Plans, Policies, and Regulations
 - o Environmental Setting
 - o Project Design Features
 - o Threshold Criteria
 - Environmental Impacts—A separate analysis is provided for each of the following categories of potential impacts:
 - On-Site Impacts
 - Off-Site Impacts
 - Mitigation Measures
 - o Level of Significance After Mitigation
- Law Enforcement Services
 - o Relevant Plans, Policies, and Regulations
 - o Environmental Setting
 - o Project Design Features
 - Threshold Criteria
 - Environmental Impacts—A separate analysis is provided for each of the following categories of potential impacts:
 - On-Site Impacts
 - Off-Site Impacts
 - Mitigation Measures
 - o Level of Significance After Mitigation
- References

References

All references cited for preparation of this analysis are listed in Section 5.16.4.

5.16.2 FIRE SERVICES

Relevant Plans, Policies, and Regulations

Federal

No federal plans and policies have been identified related to Fire Services.

State

California Fire Plan

In a collaborative effort between the State Board of Forestry and the California Department of Forestry and Fire Protection (CDF), the 2010 Strategic Fire Plan for California (Fire Plan), last revised in April 2016, was prepared to address the protection of lives and property from California wildfires while recognizing that wildfires are a natural phenomenon and can have beneficial effects, particularly on ecosystem health. The Fire Plan is a comprehensive update to the California Fire Plan prepared in 1996, the first such collaborative statewide wildfire planning document. The overarching vision of the Fire Plan is to have "A natural environmental that is more resilient and man-made assets which are more resistant to the occurrence and effects of wildland fire through local, state, federal and private partnerships" (CAL FIRE 2016a).

This vision is supported by seven goals and related objectives, and the application of adaptive management as a fundamental strategy of Fire Plan implementation. The purpose of applying adaptive management is to allow for changing conditions and to better meet environmental, social, and economic goals; to increase scientific knowledge regarding wildfires; and to foster understanding among stakeholders over time. The following are the Fire Plan's seven goals to support the vision of "A natural environment that is more resilient and man-made assets which [sic] are more resistant to the occurrence and effects of wildland fore through local, state, federal and private partnerships" (CAL FIRE 2016a). The Fire Plan states that each sequential goal is meant to build upon the accomplishment of the previous goal.

- 1. Identify and evaluate wildland fire hazards and recognize life, property and natural resources assets at risk, including watershed, habitat, social and other values of functioning ecosystems. Facilitate the sharing of all analyses and data collection across all ownerships for consistency in type and kind.
- 2. Articulate and promote the concept of land use planning as it relates to fire risk and individual landowner objectives and responsibilities.
- 3. Support and participate in the collaborative development and implementation of wildland fire protection plans and other local, County, and regional plans that address fire protection and landowner objectives.
- 4. Increase awareness, knowledge and actions implemented by individuals and communities to reduce human loss and property damage from wildland fires, such as defensible space and other fuel reduction activities, fire prevention, and fire safe building standards.
- 5. Develop a method to integrate fire and fuels management practices with landowner priorities and multiple jurisdictional efforts within local, State, and federal responsibility areas.
- 6. Determine the level of fire suppression resources necessary to protect the values and assets and risk identified during planning processes.

7. Address post-fire responsibilities for natural resource recovery, including watershed protection, reforestation and ecosystem restoration (CAL FIRE 2016a).

County

Los Angeles County Fire Department Strategic Fire Plan

The LACFD is one of the six county agencies that executed a contract with the State of California to provide wildland fire protection on State Responsibility Areas (SRAS) and to implement the CDF's 2010 Strategic Fire Plan for California, discussed above. The LACFD's 2016 Strategic Fire Plan, last updated June 1, 2016, outlines the Department's pre-fire management strategies and tactics for fire prevention, vegetation management, fire suppression, fire protection, and pre-fire projects for fire hazard reduction, habitat restoration, and training (LACFD 2016a).

County of Los Angeles Code of Ordinances

The Los Angeles County Code of Ordinances serves as the municipal code for the County. Title 32 of the County Code is the Los Angeles County Fire Code and identifies fire zones, brush clearance requirements, and structure requirements with respect to fire prevention and suppression. In the Los Angeles County Code of Ordinances (specifically, Title 20, Los Angeles County Utilities Code; Division 1, Water; Chapter 20.16, Design and Construction), requirements related to fire flow and fire hydrant placement are identified. Requirements related to parcel and dwelling access are identified in Chapter 21.24 of the Los Angeles County Subdivisions Code.

County Fire Department Developer Fee Program

On July 12, 1990, the Los Angeles County Board of Supervisors adopted the County Developer Fee Program (*California Government Code*, Sections 66000–66008) to fund (1) the purchase of fire station sites; (2) the construction of new stations and facility improvements; and (3) the purchase of equipment. The County annually adjusts developer fees to reflect changing costs. The Applicant would pay fees as annually updated in the County Developer Fee Program for the purchase of land for fire station sites; the construction of fire stations; and the provision of certain equipment. As an alternative to fee payment, the Developer Fee Program allows the LACFD and the Applicant to enter into an agreement whereby the Applicant would provide land and would construct and equip some or all fire stations required for the Project.

County of Los Angeles General Plan and Antelope Valley Area Plan

The *County of Los Angeles General Plan* and *Antelope Valley Area Plan* address issues that affect the County, including, but not limited to, fire protection and prevention. Relevant goals and policies in the *Antelope Valley Area Plan* include those listed below.

Land Use Element

Policy LU 3.2: Except within economic opportunity areas, limit the amount of potential development in Very High Fire Hazard Severity Zones, through appropriate land use designations with very low residential densities, as indicated in the Land Use Policy Map (Map 2.1) of this Area Plan.

Conservation and Open Space Element

Policy COS 15.2: Prohibit continuous all-night outdoor lighting in rural areas, unless required for land uses with unique security concerns, such as fire stations, hospitals, and prisons.

Policy COS 16.2: Maximize the use of native vegetation in landscaped areas, provided that vegetation meets all applicable requirements of the Fire Department and the Department of Public Works.

Public Safety, Services and Facilities Element

Goal PS 1: Protection of the public through fire hazard planning and mitigation.

Policy PS 1.1: Limit the amount of potential master-planned development in Very High Fire Hazard Severity Zones through appropriate land use designations with very low residential densities, as indicated in the Land Use Policy Map (Map 2.1) of this Area Plan.

Policy PS 1.2: Require that all new developments provide sufficient access for emergency vehicles and sufficient evacuation routes for residents and animals.

Policy PS 1.3: Promote fire prevention measures, such as brush clearance and the creation of defensible space, to reduce fire protection costs.

Policy PS 1.4: Provide strict enforcement of the Fire Code and all Fire Department policies and regulations.

Goal PS 7: Emergency services that respond in a timely manner.

Policy PS 7.1: Require visible addresses on buildings and at entrances to properties as required by the Fire Code.

Policy PS 7.2: Ensure that Fire Stations are adequately staffed.

Policy PS 7.3: Strive for a timely response to every call for service.

The Project's consistency with the County's relevant plans, policies, and regulations is analyzed in the Section 5.8, Land Use, Entitlements, and Planning section of this document.

Environmental Setting

County of Los Angeles Fire Department

Fire protection service is provided to the Project area by the Consolidated Fire Protection District of Los Angeles County, commonly known as the County of Los Angeles Fire Department (LACFD). LACFD Fire Station 77, located at 46833 Peace Valley Road in Gorman, is the jurisdictional engine company for the Western Antelope Valley, including the Project site. This station is located approximately two miles southwest of the site. The response time

from Station 77 to the nearest Project access road is approximately eight minutes. LACFD Station 149, located at 31770 Ridge Route Road in Castaic, provides paramedic services to the Project site. The response time from Station 149 to the nearest Project boundary is approximately 28 minutes (LACFD 2015a). There is also a heliport at Fire Station 77 that is used for refueling and patient pick up. The locations of Stations 77 and 149 are illustrated on Exhibit 5.16-1, Existing Fire Station Locations.

Additional fire protection services would be provided by the closest available LACFD response units listed in Table 5.16-1, Closest County of Los Angeles Fire Stations. Should a significant incident occur within the jurisdiction of the LACFD, the Project would be served by the resources of the LACFD as a whole instead of just the station nearest to the site. A description of the operational characteristics of the stations closest to the site and, therefore, most likely to respond are provided below in Table 5.16-1.

TABLE 5.16-1
CLOSEST COUNTY OF LOS ANGELES FIRE STATIONS

Fire Station	Distance to Project Site	Address	Company Type	Personnel			
Station 77	2 miles	46833 Peace Valley Rd Gorman	1 Engine	3-person engine company			
Station 149	24 miles	31770 Ridge Route Castaic	1 Engine 1 Paramedic Squad	3-person engine company 2-peron paramedic squad			
Station 157	24 miles	15921 Spunky Canyon Rd Green Valley	1 Engine	On-call fire station*			
Station 112	21 miles	8812 West Ave E-8 Lancaster	1 Engine	On-call fire station*			
Station 76	26 miles	27223 Henry Mayo Dr Valencia	1 Engine 1 Patrol	4 firefighters			
* no permanent staff							
Source: LACFD 2015a, 2015b.							

According to the LACFD, fire protection services in the Project area appear to be adequate for its current rural development (LACFD 2015a).

In response to increased demands for new facilities, equipment, and staffing created by new development, the County of Los Angeles has implemented a Developer Fee Program to fund the purchase of station sites; to construct new stations and facility improvements; and to fund needed equipment. The County annually adjusts the developer fees to reflect changing costs. The Developer Fee, \$0.9180 per square foot of new development (for all land uses) in the Antelope Valley (Area of Benefit 3), is effective February 1, 2017 (LACFD 2016b) and collected at the time building permits are issued. This Developer Fee Program allows for station funding and land dedication in lieu of payment of fees.

As part of this program, the LACFD prepares a Developer Fee Detailed Fire Station Plan to identify anticipated facilities that would be constructed during the LACFD's five-year

Existing Fire Station Locations Centennial Project



planning horizon. This plan is updated annually, and the latest plan lists four future fire stations in the Gorman area for the Centennial Project (LACFD 2016b). Funding for staffing and operations of all fire stations would be incorporated into the LACFD annual operating budget. These costs are partially funded through additional property tax revenue as a result of development. Increased property tax revenue associated with the Project would provide additional funding that would offset any increase in the LACFD staffing and operational costs as a result of the Project.

In the case of a significant incident requiring additional fire protection resources, the LACFD participates in a statewide mutual aid system that allows unaffected fire agencies to voluntarily provide aid to other agencies, local governments, operational areas, and the State. The State of California also participates in a nationwide mutual aid system (County of Los Angeles 2012). In addition, the LACFD has automatic mutual aid agreements with the Kern County Fire Department, the Ventura County Fire Department, and the United States Forest Service (USFS), which would allow for these other fire agencies to respond to fire incidents at the site and for the LACFD to respond to fire incidents in Kern County, Ventura County, and the Angeles National Forest (LACFD 2015b).

Kern County Fire Department

The Kern County Fire Department (KCFD) serves an area spanning over 8,140 square miles, including the unincorporated areas of Kern County and the Cities of Arvin, Delano, Maricopa, McFarland, Ridgecrest, Shafter, Taft, Tehachapi, and Wasco. Over 546 uniformed firefighters are stationed in 46 fire stations throughout Kern County. The KCFD has 14 Mutual Aid Agreements with neighboring fire suppression organizations to further strengthen the emergency response services (KCFD 2015a).

As stated above, the LACFD participates in an automatic mutual aid agreement with the KCFD where the LACFD provides reciprocal services to the KCFD in exchange for the KCFD's response to this area. Under this agreement, the LACFD responds to fire incidents in areas within approximately 6.0 miles north of the County line from Interstate (I) 5 to Edwards Air Force Base, and the KCFD responds to fire incidents in areas within approximately 3.0 miles south of the County line from Edwards Air Force Base to west of I-5 (LACFD and KCFD 2001). This agreement makes the equipment of each Fire Department available to the other on a one to one basis (KCFD 2015c).

Battalion 5 (South Kern County) includes four Kern County fire stations that are located closest to the Project site, as listed in Table 5.16-2, Closest Kern County Fire Stations.

TABLE 5.16-2 CLOSEST KERN COUNTY FIRE STATIONS

Fire Station	Approximate Driving Distance to Project Site	Address	Equipment*	Personnel
Station 56	12 miles	1548 Golden State Hwy Lebec	1 Type 2 engine, 1 Type 3 engine, 1 Type 6 engine	3 firefighters
Station 57	16 miles	729 West End Dr Frazier Park	1 Type 3 engine, 1 Type 6 engine	3 firefighters
Station 55	18 miles	5441 Dennis McCarthy Rd Mettler	1 Type 2 engine, 1 Type 2 truck	6 firefighters
Station 58	29 miles	2420 Symonds Dr Pine Mountain	1 Type 3 engine, 1 Type 6 engine	3 firefighters

^{*} Type 1 and 2 engines typically apply to structural engines and Types 3–7 engines typically apply to wildland engines.

Source: KFCD 2015b, 2015c.

Battalion 5 serves an area that is mostly in the wildland urban interface, and response times vary due to remote locations. However, the service levels are considered adequate and mirror the staffing levels used in the County's metropolitan areas (KCFD 2015c).

Existing Fire Conditions on the Project Site

Information regarding the fire history on the Project site was obtained from CAL FIRE. CAL FIRE, the USFS Region 5, the Bureau of Land Management (BLM), the National Park Service (NPS), Contract Counties, and other agencies jointly maintain a comprehensive fire perimeter geographic information systems (GIS) layer for public and private lands throughout the state. The data includes fires that have occurred on ten acres or more dating from 1878 through 2015 (the most recent data available). According to CAL FIRE, 21 fires on 10 acres or more have occurred on site and within ½ mile of the Project site within the last 137 years. Of those fires, 8 occurred on portions of the site and 12 occurred near the site (see Table 5.16-3, Fire History On and Near Centennial Project Site, below for fire name, date of fire, acres burned and location within the Project site) (CAL FIRE 2016b).

TABLE 5.16-3 FIRE HISTORY ON AND NEAR CENTENNIAL PROJECT SITE

Fire Name	Year of Fire	Total Acres Burned	Acres Burned On Site	Approximate Location of Fire
No Name Given	1917	211.66	0.00	South of the site
No Name Given	1919	1,680.74	715.10	East of Aqueduct
No Name Given	1921	508.61	0.00	Southeast of the site
No Name Given	1923	86.71	0.00	South of the site
No Name Given	1926	489.33	0.00	South of the site
Oakland Ridge Rte 62	1928	1,002.89	857.98	East of Aqueduct and across from SR-138
Liebre Fire	1968	48,564.26	0.17	Southern section of the site
No Name Given	1986	596.70	0.00	West of the site
Pine Canyon Fire	1987	204.33	0.00	Southeast of the site
No Name Given	1988	83.16	0.00	Southwest of the site
Cement Fire 1	1994	122.02	115.96	North of Quail Lake and east of Aqueduct
Cement Fire 2	1994	625.35	601.09	Northeast section of the site
Gorman Fire	1997	187.83	0.00	Southwest of the site
Aqueduct	2003	356.09	0.00	Southwest of the site
Post	2003	37.28	0.00	Southwest of the site
Pine	2004	16,271.65	66.25	Eastern section of the site
Hwy 138 and 300 West Fire	2006	192.61	145.84	Eastern section of the site
Quail Fire	2006	4,769.78	0.00	West of the site
Pine	2014	117.05	0.00	South of the site
SR: State Route Source: CAL FIRE 2016b.				

The lack of significant historical fire activity on the Project site may be attributed to cattle grazing operations. Cattle operations coincide with the historical fire data. Cattle grazing limits fuel that would otherwise be more abundant, which results in a lower probability that a wildfire would ignite and spread. In addition, ongoing ranching activities ensure that more people are on site and able to extinguish smaller fires quickly.

Project Design Features

No PDFs have been identified for this environmental issue.

Threshold Criteria

The following significance threshold criterion is derived from the County of Los Angeles Environmental Checklist. The Project would result in a significant impact if it would:

Threshold 16-1

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

Environmental Impacts

Threshold 16-1

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

On-Site Impacts

Construction-Related Impacts

Fires can occur at construction sites. Factors affecting fire risk at construction sites include, but are not limited to, stockpiling construction materials and electrical, plumbing, and mechanical systems installation. A large amount of wood framing is expected to be used on the Project site during its 20-year buildout period. In association with the framing operations, electrical, plumbing, communications, and ventilation systems would be installed in each structure. It is expected that the electrical, plumbing, and mechanical systems would be properly installed during framing operations (i.e., they would be subject to County codes and inspections by County personnel prior to installing dry wall). In addition, construction sites would also be subject to County requirements relative to water availability and accessibility to fire-fighting equipment. During each phase of construction over the 20-year buildout period, construction activities would be required to comply with all applicable building and fire code requirements for such items as roofing materials, building construction, brush clearance, water mains, fire hydrant flows, hydrant spacing, access and design, and other hazard-reduction programs for areas identified within the Very High Fire Hazard Severity Zone (VHFHSZ),1 as set forth by the County Forester and Fire Warden. During each phase of construction, the Construction Contractor, the Applicant, and the County would coordinate to determine the most feasible locations for construction staging and equipment/materials storage.

As discussed in Section 5.3.3, Fire Safety, of Section 5.3 (Hazards and Fire Safety), portions of the Project site are located in a VHFHSZ and, therefore, the site is considered to have a high fire potential.

Fire services and emergency response for fire incidents during the initial construction phases of the Project would be provided from LACFD Fire Station 77, located at 46833 Peace Valley Road in Gorman, which is currently staffed with a three-person engine company. Emergency access to the construction sites would be provided and maintained. As stated in Section 4.5.4, Mobility Plan, National Cement Plant Road would be realigned at the southern segment but the existing road would remain in place and would be available for use for emergency access during construction.

Therefore, adherence to County fire codes and requirements (see Section 5.3, Hazards and Fire Safety) and coordination between the Construction Contractor, Project Applicant, and the County during construction would reduce potential impacts related to fire hazards at the Project site to a less than significant level.

Operational Impacts

The Project would result in the development of a maximum of 19,333 residential units, approximately 57,150 residents, and over 10.0 million square feet of non-residential development creating approximately 23,675 jobs. This development would introduce people and structures into currently undeveloped areas. With a greater number of people and structures, there is a greater potential for activities and accidents involving the use of fire, flammable/combustible materials, and electrical systems, along with the creation of fire hazards from candles, cooking, electrical and heating sources, and smoking and the use of equipment, appliances, and materials that may cause fire, explosion, or the release of smoke, gas, and/or hazardous materials. Thus, new development on the site would substantially increase the likelihood of incidents requiring LACFD response and calls for service over existing conditions. This would create a significant impact if not mitigated as required by the County of Los Angeles.

The LACFD has indicated that each additional development creates greater demands on their existing resources. They estimate that up to four additional fire stations could be needed to provide adequate fire service to the Project and meet its response time goals, with the actual number of stations determined by the LACFD based on the road network (LACFD 2015a). The Project would construct up to four stations (three medium stations and one large station) on the Project site to the LACFD's specifications. A medium station would consist of an approximate 10,000-square-foot (sf) building on an approximate 1.25-acre lot. A large station consists of an approximate 15,500-sf building on an approximately 4.00-acre lot. The large station lot is sized to also accommodate training facilities for fire fighters. It should be noted that fire station size requirements are continually modified to meet federal, State, and local requirements. The actual square footage of each fire station would be determined by the LACFD at the time of Project development.

As discussed in Section 4.0, Project Description, the Project includes conceptual site locations for three new fire station sites, with a potential fourth location to be determined on the Project site. However, without the development of the on-site fire stations on the Project site, there would be significant fire-related impacts to people and structures. As required by MM 16-1, these new fire stations are projected to provide an average five-minute response time for the first arriving unit for fire services and an eight-minute response time

for advanced life support (paramedics) to the Project site at buildout. Because MM 16-1 would ensure that fire station sites are located to meet the LACFD goal of a five-minute response time for fire and an eight-minute response time for paramedics, the impact on response times for fire protection would be reduced to a less than significant level.

Until such a time that the first fire station is conveyed to the Fire District (1,000th dwelling unit), the Project Developer would be required to pay developer fees. The County of Los Angeles requires the Applicant to pay fees as detailed in the County Fire Department Developer Fee Program (MM 16-2). Upon completion of the first fire station, the Project Developer would be issued a developer fee credit and, at the completion of the 6,000th residential occupancy, the second fire station would become operational and be conveyed to the Fire District; at this time, the Project Developer would be issued a developer fee credit (and so on) until all required fire stations are constructed. As previously stated, the Project Applicant has agreed to dedicate the land and construct and equip up to four new fire stations. Construction of these fire stations will be subject to approval by the LACFD and costs would be borne solely by the Applicant (MM 16-3). The LACFD would assign a project manager to liaison with the Applicant and/or the designated contractor and architect. The Project includes conceptual fire station sites to serve the Project's residents and non-residential development, as shown on Exhibit 4-1, Centennial Project – Conceptual Land Use Plan.

Property tax revenues, which would increase annually as the Project is built out over time, would provide funds for the operation and staffing of the fire stations. Ultimately, it would be the LACFD's responsibility to ensure that staffing and resource service levels balance with the rate of Project development. Because the Project accommodates adequate opportunities for the development of on-site fire stations to serve Project development and because MMs 16-2 and 16-3 would ensure that funding and fire station sites are provided for these new fire stations as part of the implementation of the Project (as discussed below), the impact on the demand for new fire stations would be reduced to a less than significant level.

Fire services and emergency response for fire incidents during the initial development phases of the Project would be provided from Fire Station 77. This station would serve the Project until such time that the $1,000^{th}$ dwelling unit is built on the site (at which time the first on-site fire station shall be operational) (MM 16-3). The KCFD may also provide fire service and emergency response under the mutual aid agreement with LACFD.

As discussed in Section 5.3, Hazards and Fire Safety, the Project roadways would be built to County of Los Angeles standards or would be modified by the Project for unique types of roadways. The internal roadways would be designed to ensure that proper access for emergency ingress and egress would be provided for evacuation and for emergency vehicle access. The National Cement Plant Road would be part of the Project's circulation system. The southern segment of this road would be realigned to connect to SR-138 west of Quail Lake, but the existing southern segment of the roadway would be improved to become an access point into the Project site (east of Quail Lake). There would be no impact with the continued use of National Cement Plant Road.

To ensure that future residents, visitors, employees and other people on the Project site are informed regarding evacuation routes and other aspects of an emergency response, the Project Applicant has prepared an Emergency Response Plan for the Project; in accordance with MM 3-8 in Section 5.3, Hazards and Fire Safety, this Evacuation Plan will be reviewed and approved by the County of Los Angeles Department of Regional Planning, the LACFD, and the LASD. The Emergency Response Plan would be distributed to each property tenant or purchaser in accordance with MM 3-8 in Section 5.3, Hazards and Fire Safety.

Land uses in the Business Park land use category planned on the Project site may use substances and/or chemicals considered to be hazardous/flammable by the State of California. Refer to Section 5.3, Hazards and Fire Safety, for a discussion of hazardous materials that are potentially associated with the Project. Impacts related to hazardous materials use would be less than significant with implementation of the MMs.

As stated in Section 5.3, Hazards and Fire Safety, the Project shall comply with all applicable LACFD code and ordinance requirements for building construction, access, water mains, fire flows, and hydrants. Thus, development on the site would be constructed to prevent the creation of fire hazards; to have the necessary fire alarm and sprinkler systems; and to have adequate emergency fire access.

As stated in the Project Description (Section 4.5.9), the Project includes a domestic (potable) water supply, treatment, storage, and distribution system (Potable Water System). The design, construction, and operation of the Potable Water System would be required to comply with standards set by the California Department of Health Services and Los Angeles County Department of Public Works. The planned domestic water facilities are depicted on Exhibit 4-13, Centennial Project – Conceptual Domestic Water System, and include the following: water treatment facility, storage tanks, booster pump stations, pressure reducing stations, recharge basins, wells, and distribution lines. It should be noted that the potable water distribution system requires four pressure zones, each of which would provide an appropriate water pressure to meet peak demand and County-required fire flow requirements. The domestic water system would provide the necessary fire flows for fire incidents at the site.

Wildland Fires

The Project would introduce urban development into an undeveloped area that is subject to wildfire hazards. Portions of the Project site are within a VHFHSZ, which includes areas that are subject to high fire hazards due to the presence of high brush, woodlands, and steep slopes. The Project's potential to result in wildland fire hazards is addressed in Section 5.3, Hazards and Fire Safety. As discussed in Section 5.3.3, the Project will comply with all Very High Fire Hazard Severity Zone and High Fire Hazard Severity Zone code and ordinance requirements for fuel modification. As required by Section 4908.1 of the County of Los Angeles Fire Code, a Fuel Modification Plan must be submitted to the Forestry Division and be preliminarily approved prior to issuance of a permit for any permanent habitable structure. The Project will comply with all applicable LACFD code and ordinance requirements for construction, access, water mains, fire flows, and hydrants. MM 3-10 requires the Property Owner/Developer to provide all new Property Owners with recorded

Covenants, Conditions, and Restrictions (CC&Rs) or disclosure statements that identify the responsibilities for maintaining the fuel modification zone(s) on their property, as defined in the approved Fuel Modification Plan. The Project, for fire protection, is required to be compliant with State and County fire regulations, standards, and guidelines. This would ensure that the Project would not result in an increased potential for wildland fire hazards, and impacts would be less than significant.

The Project Description (Section 4.5.14) provides more detail regarding the Project's landscape concept and Fuel Modification Plan. The landscape concept and fuel modification plan would reduce the potential for wildland fire and brush fire hazards on the Project site.

The existing heliport at Fire Station 77 would be operational for refueling and patient pick up and could be used to scoop water from Quail Lake for brush fire protection. On site, a fire hydrant system would be constructed to fight fires within the development area. Development would eliminate the potential for brush fires, and the on-site water system and fire hydrants would be available to provide fire flows for fire suppression. Therefore, there would be a less than significant impact on brush fire protection services.

Response Times

According to the Insurance Service Office (ISO), using a Fire Suppression Rating Schedule (FSRS), a five-minute response time is typically the standard for adequate fire protection. The development of up to four new fire stations, in combination with Fire Station 77, are projected to provide an average five-minute response time within the Centennial development at Project buildout (MM 16-1). This is consistent with the LACFD goal of a five-minute or less average first-due response time in urban areas (LACFD 2015a).

Off-Site Impacts

The off-site Project features, including intersections with SR-138, utility connections, water wells, and California Aqueduct crossings, would not, by themselves, generate population growth that would result in additional demand for fire protection services. Additionally, the installation of the proposed well system as part of the Project would assist fire protection and emergency response capabilities by assuring adequate fire flows and pressures at the site. There would be no impact on fire protection services and no mitigation is required.

Where off-site features would necessitate construction activity within a roadway right-of-way, implementation of MM 10-8 from Section 5.10, Traffic, Access, and Circulation, would ensure that Traffic Management Plans are prepared and submitted to the County of Los Angeles Public Works Department for review and approval. The Traffic Management Plans would describe traffic-control measures that would be implemented to maintain traffic flow in all directions including where utilities and other improvements are being implemented in existing roadways. Because impacts to circulation would be minor and temporary and because traffic-control measures would be detailed in the Traffic Management Plans, traffic movements would not be disrupted and emergency vehicles would be accommodated. Therefore, less than significant impacts would occur.

Impact Summary:

Development of the Project site would introduce people and structures into currently undeveloped areas resulting in an increase in the demand for fire services, which is considered a significant impact. Adherence to County fire codes and requirements during construction would reduce the potential for fire hazards at the Project site. The presence of Station 77, which is located approximately two miles from the Project site, and the proposed on-site fire station sites would adequately serve the Project. Up to four on-site fire stations would be built and equipped as part of the Project (MM 16-1 and MM 16-3). Project development fees would also generate tax revenue (MM 16-2) to provide funding for staffing of fire service resources; therefore, no significant impact would result related to fire protection services. Compliance with MMs 16-1 through 16-3 would provide for sites and funding for fire protection; therefore, the impact to fire services would be less than significant.

Mitigation Measures

The following mitigation measures reflect the consideration of fire services as part of the Project. MMs 16-1 through 16-3 provide fire station sites and funding for fire protection services to serve the Project.

- MM 16-1 At buildout, the Los Angeles County Fire Department (LACFD) fire stations shall be located such that response times to the Project site shall be 5 minutes or less for fire service responses and 8 minutes or less for the advanced life support (paramedic) unit responses within the Project site.
- MM 16-2 The Project Applicant/Developer shall pay developer fees in effect at the time of building permit issuance, in accordance with the LACFD Developer Fee Program until such time the Project Applicant/Developer has conveyed an approved, operational fire station to the LACFD. As an alternative to fee payment, the Developer Fee Program allows the LACFD and the Project Applicant to agree on a program whereby the Project Applicant would provide land and would construct and equip the fire stations required for the Project in exchange for a credit towards the Project's fee payments.
- MM 16-3 The Project Applicant/Developer shall provide land, convey title, and shall construct and equip to the specifications and requirements of the LACFD, for up to four new Fire Stations to the LACFD. The approved final plans and specifications for the Project shall identify locations of the fire stations. The LACFD shall have final approval over the fire station site locations. The timing for the construction of the on-site fire stations shall be established by the LACFD dependent upon the phasing of development, with the first on-site fire station operational no later than the time the 1,000th dwelling unit is built on site.

Level of Significance After Mitigation

Implementation of MMs 16-1 through 16-3 would reduce potentially significant impacts related to fire protection services to levels that are less than significant.

5.16.3 LAW ENFORCEMENT SERVICES

The following analysis is based on information provided by the Los Angeles County Sheriff's Department (LASD) and the California Highway Patrol (CHP).

Relevant Plans, Policies, and Regulations

Federal

No federal plans and policies have been identified related to Law Enforcement Services.

State

No State plans and policies have been identified related to Law Enforcement Services.

County

Law Enforcement Facilities Mitigation Fee

On June 24, 2008, the Los Angeles County Board of Supervisors approved Ordinance No. 2008-0033, which amends Title 22 (Planning and Zoning) of the Los Angeles County Code with the addition of Chapter 22.74, Law Enforcement Facilities Fee. This Ordinance became effective August 23, 2008. This amendment established a Law Enforcement Facilities Mitigation Fee (LEFMF) plan for new residential, commercial, office, and industrial development in the unincorporated Santa Clarita, Newhall, and Gorman areas. The adoption of the ordinance established a fee to be imposed upon new development projects. This fee serves to finance land acquisition, engineering, construction, installation, purchasing, and other direct costs related to capital law enforcement facilities and equipment, as required to serve new development in unincorporated areas of North Los Angeles County.

County of Los Angeles General Plan and Antelope Valley Area Plan

The *County of Los Angeles General Plan* and *Antelope Valley Area Plan* address issues affecting the provision of law enforcement services. Relevant goals and policies in the Antelope Valley Area Plan include:

Public Safety, Services and Facilities Element

Goal PS 4: Protection of public safety through law enforcement and crime prevention strategies.

Policy PS 4.1: Support an increased law enforcement presence in every Antelope Valley community and explore new funding mechanisms to expand law enforcement services.

Policy PS 4.2: Support a strong law enforcement presence on highways and streets to strictly enforce speed limits and other vehicle safety laws.

Policy PS 4.3: Promote and support neighborhood watches to create more eyes and ears in the community.

Policy PS 4.4: Educate the public on crime prevention programs and resources offered by the Sheriff's Department.

A consistency analysis of the Project's specific goals and policies with the County's relevant plans, policies and regulations is provided in the Land Use, Entitlements, and Planning Section (Section 5.8) of this document.

Environmental Setting

Los Angeles County Sheriff's Department

The Santa Clarita Valley Station of the LASD is responsible for providing general law enforcement for all crimes against persons or property in the Project area, and the CHP provides traffic control and accident investigation. The closest LASD Station is located near the intersection of Magic Mountain Parkway and Valencia Boulevard at 23740 Magic Mountain Parkway in Valencia, approximately 28 miles south of the Project site, as shown on Exhibit 5.16-2, Existing Law Enforcement Station Locations. This station's service area includes the Angeles National Forest and the communities of Bouquet Canyon, Canyon Country, Castaic, City of Santa Clarita, Gorman, Hasley Canyon, Newhall, Neenach, Sand Canyon, Saugus, Six Flags Magic Mountain, Sleepy Valley, Southern Oaks, Stevenson Ranch, Sunset Point, Tesoro del Valle, Valencia, Val Verde, West Hills, and Westridge. This area is generally bound on the north by the Kern County Line, on the east by the township of Agua Dulce, on the south by the Los Angeles City limits, and on the west by the Ventura County line.

The Santa Clarita Valley LASD Station provides general law enforcement services, including patrol and response, a crime prevention unit, investigation, and traffic control. It provides these services via patrol units, detectives, a Special Problems Unit, a homeless program, school deputies, business alliance programs, valley force tram, and a juvenile team. Their service area also includes the City of Santa Clarita, which contracts with the LASD for law enforcement services. The Santa Clarita Valley LASD Station maintains a staff of 200 sworn deputies and 43 civilian employees and is equipped with patrol vehicles, aircraft, search and rescue assets, mounted patrols, and emergency operations assets.

The Santa Clarita Valley LASD Station administers various community-based programs, including the Volunteers on Patrol, Explorer, Neighborhood Watch, Vital Intervention and Directional Alternatives (VIDA), and Drug Abuse Resistance Education (DARE) programs. The Search and Rescue (SAR) operations are conducted by the Sheriff's Department Reserve Forces Bureau from seven stations, including the Santa Clarita Valley LASD Station, which has a Mounted SAR team that uses specially-trained horses and riders in terrain that is not accessible by motorized vehicles or helicopters. The LASD provides facilities, some vehicles, and some life-saving equipment to perform core functions but not operating funds. Rather, SAR teams are largely reliant on donations of their time and equipment.

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The LASD staff has indicated that the generally accepted service ratio is 1 deputy for every 1,000 residents. The resident population in the Santa Clarita Valley LASD Station's service area is approximately 279,000 people and that Station currently has 1 deputy per 2,364 residents, well below the standard.

Generally accepted response times for law enforcement agencies are 10 minutes or less for emergency situations (i.e., a crime or incident that is in progress and includes a life-threatening situation); 20 minutes or less for priority incidents (i.e., a crime or incident that is in progress but does not include a life-threatening situation); and 60 minutes or less for routine or non-emergency situations (i.e., a crime or incident that has already occurred and does not include a life-threatening situation). The response time is measured by the Station as being from the time a call is received until the time a responding unit arrives at the incident location.

The Station's anticipated response times to the Project site for emergency, priority, and routine incidents are 1 to 10 minutes; 1 to 20 minutes; and 1 to 60 minutes respectively. Response times are variable because the responding patrol units may be deployed elsewhere within the Station's service area and not necessarily dispatched from the Station itself.

Current demand for LASD services to the Project site are limited due to its largely undeveloped condition. Part 1 crime data for Reporting Districts 0681 and 0685, which are located in the unincorporated northwest portion of Los Angeles County and which include the Project site, included 1 aggravated assault, 2 burglaries, and 1 larceny (excluding motor vehicle theft) from January 1 to June 30, 2015.

Mutual aid agreements with various other law enforcement agencies in and beyond Los Angeles County allow for reciprocal services to be provided across jurisdictional boundaries in the event of disaster or other crises. These agreements are organized through the State's Office of Emergency Services, with associated costs for mutual aid servicers subject to reimbursement by the assisted agency.

California Highway Patrol

The CHP is the traffic law enforcement organization for California and is divided into eight geographical regions throughout the state. The primary responsibilities of the CHP are to enforce traffic laws on County and State highways; to assist in emergencies exceeding local capabilities; to provide disaster and life-saving assistance; to complete truck and bus inspections; to perform air operations and vehicle theft investigation and prevention measures; to protect State property and employees; and to complete public education on driver safety (CHP 2015a). The CHP has mutual aid agreements with the Los Angeles and Kern County law enforcement agencies and provides service and assistance when requested.

The CHP stations in the vicinity of the Project site are the Newhall Area, Fort Tejon Area, and Antelope Valley Area stations. The locations of these three CHP stations are shown on Exhibit 5.16-2. The Newhall Area and Antelope Valley Area CHP stations are located in the CHP's Southern Division, which serves the Los Angeles County area. The Southern Division includes 10 area offices, 1 commercial inspection facility, 1 communication and dispatch center, and 1,024 officers. The Fort Tejon Area CHP station is located in the CHP's Central

Division. The Central Division includes 15 Area Offices and 2 commercial inspection facilities.

The Newhall Area CHP station is located at 28648 The Old Road in Valencia, near the I-5 and SR-126 interchange. This station has 76 officers, and patrols 204 miles of freeway and 224 miles of unincorporated roadways within a 674-square-mile area (CHP 2015b). The Fort Tejon Area CHP station is located at 1033 Lebec Road in Lebec. This station has 30 officers and patrols 1,300 miles of freeways, roadways, and unincorporated areas in 3 counties. The Antelope Valley Area CHP station is located at 2041 West Avenue I in Lancaster. This station patrols freeways and County roadways in the Antelope Valley.

There are no long-range planning documents or uniform staffing requirements used by the CHP to project future needs in each service area. Rather, each station determines its own staffing allocation relative to the geographical needs within the station area's boundaries based on the service area's unique requirements and budget constraints. The CHP does not receive or base its deployment on the revenues that may be generated within its service area. The primary funding source for CHP facilities and staffing is State motor vehicle registration fees. Allocation of these fees to each service area is determined by CHP Headquarters in Sacramento. The Newhall CHP Area, which includes the Project site, has submitted requests for future staffing; however, there are no immediate plans to increase either Newhall Areabased personnel or equipment (Miler 2016).

Project Design Features

No PDFs have been identified for this environmental issue.

Threshold Criteria

The following significance threshold criterion is derived from the County of Los Angeles Environmental Checklist. The Project would result in a significant impact if it would:

Threshold 16-2

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

Environmental Impacts

Threshold 16-2

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

On-Site Impacts

Los Angeles County Sheriff's Department

Construction-Related Impacts

The LASD would be responsible for providing general law enforcement services to the Project site during construction, including response to calls for service in the cases of trespassing, theft, and vandalism that can occasionally occur at construction sites. Security fencing and private security would be provided by the Applicant in construction areas within the Project site and would reduce the need for LASD services. With these services, short-term, construction-related impacts would be less than significant.

Operational Impacts

Buildout of the Project would result in a maximum of 19,333 residential units, approximately 57,150 residents, over 10.0 million square feet of non-residential development creating approximately 23,675 jobs (refer to Section 5.9, Population, Housing and Employment). Based upon the generally accepted standard for officer-to-population ratio, as provided by the LASD (i.e., 1 field deputy per 1,000 residents), the Project would require 56 additional field deputies. This increase in field personnel would necessitate a concurrent increase in support resources such as detectives, complaint desk officers, support staff, vehicles, and portable radios which, if not provided, would result in a significant impact.

The Project would have to Law Enforcement Facilities Mitigation Fee (LEFMF) in compliance with MM 16-4, which would reduce this potentially significant impact. The LEFMF, which would be paid by the Applicant, will provide sufficient revenues to pay for land acquisition, engineering, construction, installation, purchasing, and any other direct costs necessary to provide the capital law enforcement facilities and equipment needed to serve new development in unincorporated areas of North Los Angeles County.

In addition, the Project includes the construction of a permanent LASD station on the Project site, as shown in Exhibit 4-1, Centennial Project – Conceptual Land Use Plan. The proposed LASD station would be located in the Business Park area along the north side of the SR-138. This LASD station, its precise location, its timing, and its associated staffing levels would be developed at a future time to be determined by the LASD and the Applicant based on the Project site's development rate.

The LASD's operating budget is generated through tax revenues, penalties and services, and allowed government assistance. Facilities, personnel, and equipment expansion and acquisition are tied to the County budget process and rely on tax-base expansion. Tax-base expansion would occur with development of the Project. The additional tax-base generated by the Project would offset the increased costs of providing LASD personnel and other support resources to the Project and therefore would not result in a significant impact related to LASD protection services.

Prior to development of the permanent LASD Substation, the LASD could operate out of "store front" sub-station at the first development area – Village 1 (MM 16-4). This "store front" sub-station would be properly outfitted in accordance with applicable occupancy

requirements of the LASD for such "store front" facilities, and would become operational before the first certificate of occupancy for the Project is issued. Upon approval of the applicable future tract map, the Applicant and the LASD will coordinate to finalize plans for a permanent LASD Station. The costs associated with the construction of this temporary substation would be paid by the Applicant and credited toward the LEFMF (LASD 2016).

With the addition of the "store front" LASD station and the permanent LASD Station on the Project site by buildout, response times to the Project site for emergency and non-emergency calls would improve due to the decreased distance from the site to the station. It is expected that the number of service calls and the types of incidents at the Project site and surrounding areas as the Project is built out would be similar in frequency and character to those experienced throughout the Santa Clarita Valley service area or other urbanized areas. Aside from the demand generated by the daytime and nighttime populations associated with the residential, commercial, and business park uses and public facilities, the Project does not provide for land uses that would create any new or unique types of law enforcement requirements. Any illegal on-site off-road vehicular activity would not present a law enforcement issue, as the LASD has determined that the proposed on-site facilities would adequately serve the Project (LASD 2016). The Hungry Valley State Vehicular Recreation Area, located approximately five miles west of the Project site, is a motorcycle, four-wheel drive, and all-terrain vehicle use area that provides a legal off-road alternative to illegal use of the site.

The placement of development adjacent to open space areas would result in increased use of these areas. In the event of an emergency, the Search and Rescue team from the Santa Clarita Valley LASD Station may be asked to assist. According to the LASD, the Search and Rescue team is adequately staffed and equipped to perform Search and Rescue operations and can, if necessary, obtain assistance from other equipped Search and Rescue teams located both in and outside Los Angeles County through the Los Angeles County Office of Emergency Services. The Santa Clarita Valley LASD Station's Search and Rescue Team has resources at its disposal, both in terms of personnel and equipment, to carry out its operations. Increased encroachment into Special Management Areas as a result of the Project would not place undue requirements on the Santa Clarita Valley LASD Station's Search and Rescue Team in the event of an emergency, and no significant impacts would occur.

The Project would provide for one permanent LASD station (MM 16-4). The timing for implementation of this station would be determined by the LASD in coordination with the Applicant, and would depend upon the development rate on the Project site and in its vicinity. In addition, prior to development of this permanent LASD station, the LASD would operate out of a "store front" station within the first development area. MM 16-4 would ensure that this "store front" sheriff's facility would be developed pursuant to applicable occupancy requirements of the LASD for such facilities and that it is fully operational prior to the issuance of the first certificate of occupancy for the Project. With the "store front" and permanent on-site LASD Station, the LASD has indicated that optimal response times to the Project site can be met (LASD 2016).

Compliance with MM 16-4 would reduce the potential impacts on demand for law enforcement services to the Project site to less than significant levels. No additional impacts would occur related to the construction or expansion of LASD facilities.

California Highway Patrol

During development and upon Project buildout, demand for CHP services on the area's freeways and highways would increase due to vehicular traffic generated by the Project. This would result in potentially significant impacts on CHP services. While the Newhall Service Area station would be most impacted by Project-generated traffic because its service area includes the Project site and it handles I-5 traffic west and south of the Project site, there would also be increased traffic on the I-5 north of the SR-138 in the CHP's Fort Tejon Area and on SR-138 east of the Project site in the CHP's Antelope Valley Area. In addition, the CHP would be responsible for enforcing traffic regulations, responding to traffic accidents, and providing service and assistance for disabled vehicles in the Project area.

The Project will increase traffic volumes on SR-138 and I-5, affecting the CHP's Fort Tejon, Antelope Valley, and Newhall Areas. Refer to Section 5.10, Traffic, Access and Circulation, for more information regarding Project-related traffic generation. The CHP may need to increase staffing levels, adjust boundaries, and purchase new equipment in order to address increased demand for services. However, implementation of the Project would not require new or physically altered CHP facilities to maintain acceptable service ratios, response times, or other performance objectives (Miler 2016). The additional revenues from car registration fees generated by the Project would provide funding for additional staffing and equipment, which would partially offset any increased demand on CHP services associated with the Project.

As stated above, there are no long-range planning documents or uniform staffing requirements used by the CHP to project future needs in each service area. Rather, each station determines its own staffing allocation relative to the geographical needs within its boundaries based on the service area's unique requirements and budget constraints. Each CHP Station, under the direction of the Area Commander, drafts an annual report that includes demographic data, the number of calls received, and response times. In the report, a recommendation would be made to add additional staff, equipment, and/or facilities if needed. The decision to add additional stations is determined at the local level and largely depends on response times.

While the Project would increase demand for services from the CHP, this demand would not require the construction of new CHP facilities, nor would it require the expansion of existing facilities that would result in physical environmental impacts. Although implementation of the Project would require additional officers, this is not considered a significant environmental effect. As stated above, each CHP area station ultimately recommends the timing of hiring and number of new officers hired as part of its standard staffing practices. Therefore, impacts on the CHP would be less than significant.

Off-Site Impacts

The off-site Project features, including intersections with SR-138, utility connections, water wells, and California Aqueduct crossings, would not, by themselves, generate population growth that would result in additional demand for law enforcement services. The presence of the off-site wells may result in occasional security-related calls for service. However, the level of this demand compared to the anticipated routine daily calls for service from development on the site would be negligible, particularly in light of the law enforcement facilities that would be constructed as part of the Project. There would be no impact on law enforcement services and no mitigation is required.

Where off-site features would necessitate construction activity within a roadway right-of-way, implementation of MM 10-8 from Section 5.10, Traffic, Access, and Circulation, would ensure that Traffic Management Plans would be prepared and submitted to the County of Los Angeles Department of Public Works' Traffic Division for review and approval. The Traffic Management Plans would describe traffic-control measures that would be implemented during construction to maintain traffic flow in all directions, including where utilities and other improvements are being implemented in existing roadways. Because impacts to circulation would be minor and temporary and because traffic-control measures would be detailed in the Traffic Management Plans, traffic movements would not be disrupted and emergency vehicles would be accommodated. Therefore, less than significant impacts would occur.

<u>Impact Summary</u>:

The Project would result in a maximum of 19,333 residential units, approximately 57,150 residents, and over 10.0 million square feet of non-residential development creating approximately 23,675 jobs; this would result in an increase in the demand for services from the LASD. This would also potentially result in significant impacts on the LASD's ability to provide law enforcement services. However, with the provision of a "store front" temporary sub-station and construction of a permanent LASD Station at the site (MM 16-4), response times to the site for emergency and non-emergency calls would be within the County guidelines. The additional tax-base generated revenues by Project development would also offset increased demands on the LASD. In addition, payment of LEFMF, as required by County Ordinance No. 2008-0033, would provide funding to mitigate impacts to the LASD for services needed by the Project (MM 16-4). Therefore, impacts would be reduced to levels that are less than significant.

As with the LASD, the CHP would have increased responsibilities with the implementation of the Project. The CHP is funded out of revenues from car registration fees. The increase in registrations from development at the site would partially offset the impact so that the increased demand for CHP services would not be significant.

Mitigation Measures

MM 16-4

The Project Applicant/Developer shall pay Law Enforcement Facilities Mitigation Fee (LEFMF) to the Los Angeles County Sheriff's Department (LASD) pursuant to the requirements established in County Ordinance No. 2008-0033. The amount of fees to be paid will be determined based on the established fee in Section 22.74.030 of the County Code. The Project incorporates a temporary "store front" sub-station, followed by construction of a permanent LASD Station included on the Project site, in lieu of a portion of the LEFMF, as allowed under Section 22.74.090 (Consideration in Lieu of Fee) of the County Code. Costs associated with the construction of the temporary "store front" sub-station and permanent LASD Station would be credited against the LEFMF.

Prior to completion of the permanent LASD Station, the "store front" substation may be located on site in Village 1 on the north side of the SR-138. This temporary sub-station shall be properly outfitted in accordance with applicable occupancy requirements of the LASD for such "store front" facilities and shall be operational prior to the issuance of the first certificate of occupancy for the first phase of Project development.

The Centennial Land Use Plan identifies a conceptual location for one LASD Station in the Business Park area on the Project site north of the SR-138. The permanent LASD Station shall be constructed immediately following completion of the first phase of development. The LASD shall have final approval over the temporary sub-station and permanent LASD Station site locations.

Level of Significance after Mitigation

Implementation of MM 16-4 would reduce potentially significant impacts related to LASD protection and law enforcement services from the Project to levels that are less than significant.

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