

## 5. Environmental Analysis

### 5.14 PUBLIC SERVICES

This section addresses public services including: Fire Protection and Emergency Services, Law Enforcement, School Services, and Library Services. Park Services are addressed in Section 5.15, *Recreation*. Public and private utilities and service systems, including water, wastewater, and solid waste services and systems, are addressed in Section 5.17.

#### 5.14.1 Fire Protection and Emergency Services

##### 5.14.1.1 ENVIRONMENTAL SETTING

The Los Angeles County Fire Department (LACoFD) serves the unincorporated areas of Antelope Valley (Project Area) as well as 58 cities that choose to have the County of Los Angeles (County) provide fire and emergency medical services (EMS) services, including the City of La Habra, which is located in Orange County, as shown on Figure 5.14-1. The LACoFD provides fire suppression and emergency medical services to over four million residents within Los Angeles County. The LACoFD operates 170 fire stations within nine divisions. The LACoFD had a total of 4,713 personnel in 2013 (LACoFD 2013). In addition to fire suppression, the LACoFD also provides fire prevention services, EMS, hazardous materials services, and urban search and rescue (USAR) services.

Under a mutual aid pact covering federal forestlands, responsibility for non-structure fires within the National Forest belong to the United States Forest Service (USFS), while LACoFD has the primary mission of suppressing structure fires. Although these responsibilities are stated in the mutual aid pact, each agency fights both wild and structure fires in actual fire emergencies. In addition, an automatic aid agreement, which is an agreement that allows the closest municipality to provide an initial response to fires that may occur in a part of another municipality, exists between USFS and LACoFD. Firefighting, however, is not the primary function of USFS, and the agency is on duty at only certain times of the day. As a result, LACoFD would be called upon to provide fire service if fires involving structures or brushlands near the National Forest boundary occur after USFS's hours of service.

The LACoFD has several standards to maintain adequate fire protection within their service area. The current standards for response times are:

- 5 minutes or less for response times for urban areas
- 8 minutes or less for suburban areas
- 12 minutes or less for rural areas

Currently there are two battalions with 21 fire stations located throughout the Project Area as shown on Table 5.14-1.

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**Table 5.14-1 Fire Stations Serving the Project Area**

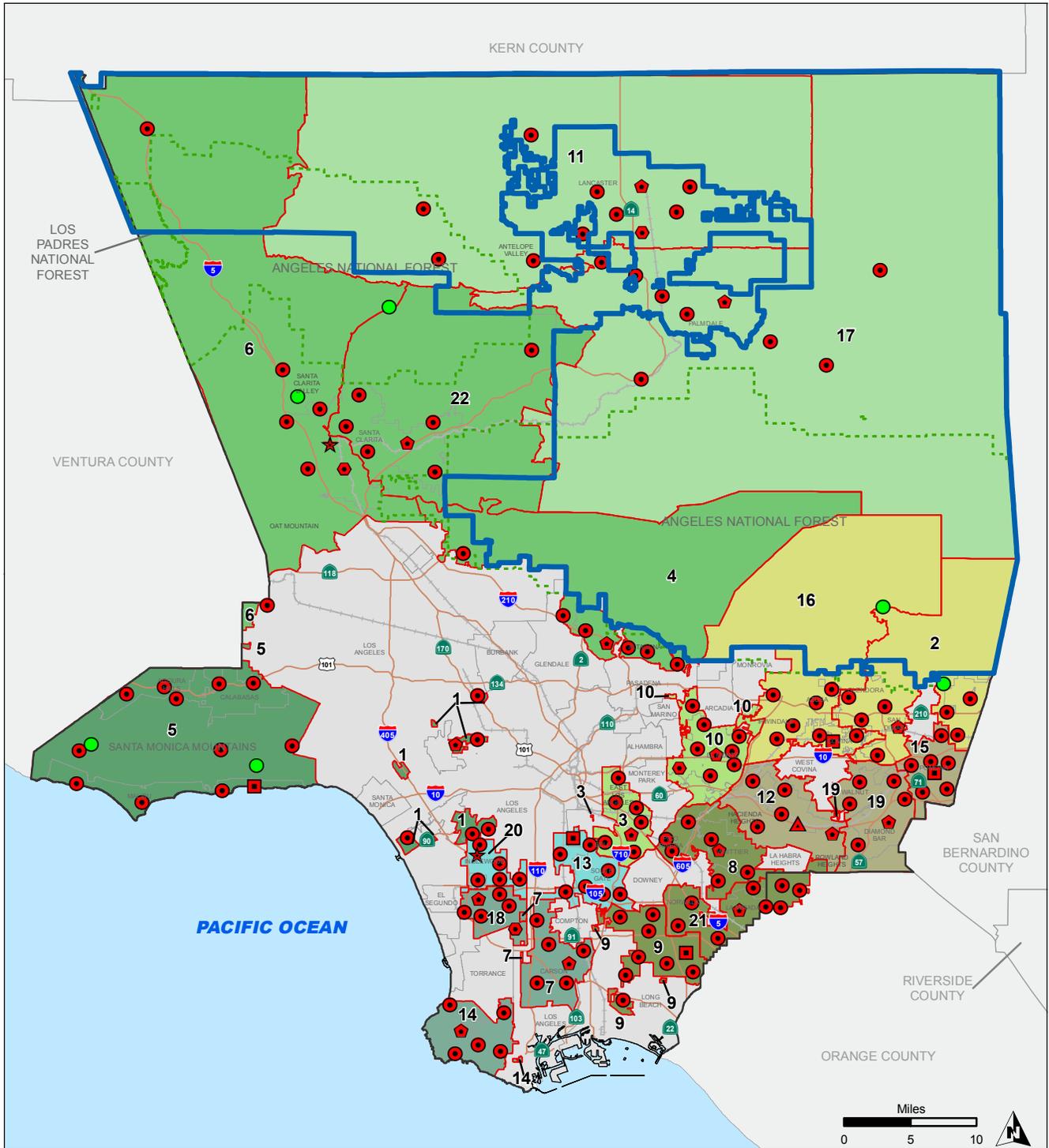
BATTALION 11		BATTALION 17	
Fire Station#33-HDQTRS	44947Date Ave Lancaster, 93534	Fire Station#24-HDQTRS	1050 W Avenue P Palmdale, 93550
Fire Station#78 (CFF)	17021N Elizabeth Lake Rd Palmdale, 93550	Fire Station#37	38318 E9TH ST EAST PALMDALE, 93550
Fire Station#84	5030 W AvenueL-14 Quartz Hill, 93536	Fire Station#79	33957Longview Rd Pearblossom,93553
Fire Station#112(CFF)	8812 W Avenue E-8 Lancaster, 93535	Fire Station#80	1533 W Sierra Hwy Acton, 93510
Fire Station#117	44851 30th St East Lancaster, 93535	Fire Station#81	8710 W Sierra Hwy Agua Dulce, 91350
Fire Station#129	42110 6th St West Lancaster, 93534	Fire Station#92	8905 E Avenue U Littlerock, 93535
Fire Station#130	44558 40thSt West Lancaster, 93536	Fire Station#93	5624 E Avenue R Palmdale, 93550
Fire Station#134	43225N 25thSt W Lancaster, 93534	Fire Station#114	39939N 170th St East Palmdale, 93550
Fire Station#135	1846 East Avenue K-4 Lancaster, 93535	Fire Station#131	2629 E Avenue S Palmdale, 93550
Fire Station#140(CFF)	8723 Elizabeth Lake Rd Leona Valley,93550	Fire Station#136	3650 Bolz Ranch Rd Palmdale, 93551
Fire Station #157 (Cff)	15921 Spunky Canyon Rd Green Valley, 91350		

The Forestry Division of the LACoFD 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. The Division staffs a Forestry unit in Lake Hughes. At the unit, tree seedlings are provided to the public and advice is shared with local homeowners.

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FIGURE 5.14-1

## FIRE DEPARTMENT BATTALIONS AND STATIONS



	Fire Camp		Battalion Boundary & Number		Division 5
	Fire Station		Division 1		Division 6
	Battalion HQ		Division 2		Division 7
	Division HQ		Division 3		Division 8
	Battalion / Division HQ		Division 4		Division 9
	Region HQ		Antelope Valley Project Area		Unincorporated Areas
	Battalion & Region HQ				Cities

Source: Department of Regional Planning, Dec. 2013. Additional Sources: Los Angeles County Fire Department.

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The Project Area requires responses to structural fires and to range fires in largely unpopulated areas. Depending on the type and extent of wildfires, assistance can be recruited as needed. The Forestry Division is tasked with using Geographic Information Systems (GIS) to map wildland fires and provide assessments of limited natural resources. It oversees development and staffs the Department's Infrared and Fire Map Program. This helicopter-based aerial camera completes simultaneous mapping of the fire perimeter and highlights hotspots near the fire line that could lead to additional fire spread.

#### Wildland Fire Hazards

LACoFD has designated lands in Los Angeles County with regard to their potential for wildland fires. These designations, determined by the County Forester, are based on an area's accessibility, amount and type of vegetative cover, water availability, and topography. LACoFD uses three wildland fire hazard designations: Moderate Fire Hazard, High Fire Hazard, and Very High Fire Hazard. Areas in Los Angeles County that are not designated within a fire hazard zone are not considered to be subject to wildland fire hazards. Areas in the Project Area that are designated within a fire hazard zone are shown on previous Figure 5.8-1, *Fire Hazard Severity Zones*.

Highly combustible natural vegetation types include chaparral, coastal sage, riparian, and oak woodlands. These plant communities include plant species such as ceanothus, chamise, sumac, sages, and wildland grasses. These plant species, which have adapted to periodic wildland fire conditions, maintain a healthy ecosystem in the region. These plant communities pose the greatest fire threat to expanding urban development due to their high combustibility and their dense biomass. However, in the area where these plant communities border urban development, the frequency of fire events may be diminished as a result of proactive fire prevention and fire suppression measures. Fire prevention measures include prescribed burns, vegetation thinning/removal, and creation of fuel modification zones, whereas fire suppression measures involve controlling fires once they have started through the use of fuel breaks, fire fighting equipment, water drops, and other techniques.

#### Regulatory Framework

##### State

##### *California Health and Safety Code (Section 13000 et seq.)*

State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards [as also set forth in the California Building Code (CBC)], fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State Fire Marshal enforces these regulations and building standards in all State-owned buildings, State-occupied buildings, and State institutions throughout California.

##### *California Code of Regulations (CCR) Title 24, Part 2 and Part 9*

Part 2 of Title 24 of the CCR refers to the CBC, which contains complete regulations and general construction building standards of state adopting agencies, including administrative, fire and life safety, and

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field inspection provisions. Part 2 was updated in 2008 to reflect changes in the base document from the Uniform Building Code to the International Building Code. Part 9 refers to the California Fire Code, which contains fire-safety-related building standards referenced in other parts of Title 24. This Code is preassembled with the 2000 Uniform Fire Code of the Western Fire Chiefs Association. This Code was revised in January 2008 with a change in the base model/consensus code from the Uniform Fire Code series to the International Fire Code.

#### ***California Public Resources Code (PRC) Sections 4201-4204***

This section of the PRC was amended in 1982 to require the California Department of Forestry to classify all State Responsibility Areas (SRAs) into fire hazard severity zones. The purpose of this code is to provide classification of lands within SRAs in accordance with the severity of fire hazard present for the purpose of identifying measures to be used to retard the rate of spreading and to reduce the potential intensity of uncontrolled fires that threaten to destroy resources, life, or property.

#### ***State Responsibility Area Fire Safe Regulations (Title 14 Natural Resources, Department of Forestry and Fire Protection)***

These regulations constitute the basic wildland fire protection standards of the California Board of Forestry. They have been prepared and adopted for the purpose of establishing minimum wildfire protection standards in conjunction with building, construction, and development in SRAs. Title 14 mandates that the future design and construction of structures, subdivisions, and developments in an SRA provide for basic emergency access and perimeter wildfire protection measures.

#### *Local*

#### ***LACoFD***

County programs for wildland fire prevention include the adoption of the State Fire Code for regulations and standards to be applied toward new development in “hazardous fire areas.” Fire prevention items addressed in the County Fire Code include provision of fire apparatus access roads, adequate road widths, all-weather access requirement, fire flow requirement, fire hydrant spacing, and clearance of brush around structures located in hillside areas that are considered primary wildland fire risk areas.

For areas located within the Very High Fire Hazard Severity Zone (VHFHSZ), County Fire Code Sections 325.2.1.2, 328.10, 1117.2.1, and 4908.1 require completion and approval of a land development plan and fuel modification plan. Appendices B and C of the County Fire Code specify that for single-family dwellings located on a lot of one acre or more in a VHFHSZ, the minimum fire flow must be 1,000 gallons per minute for a duration of two hours, and hydrants must be spaced not more than 600 feet apart and serviced from a public water system.

The LACoFD Fuel Modification Unit provides guidelines for the VHFHSZ in order to create a defensible space for effective fire protection in newly constructed and/or remodeled homes. Fuel modification zones in the Project Area are strategically placed strips of land where combustible native or ornamental vegetation has been modified or replaced with drought-tolerant, low-fuel-volume plants, creating a buffer to areas of natural vegetation surrounding the perimeter of a single-family dwelling. A fuel modification plan identifies specific

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zones within a property which are subject to fuel modification. Plans vary in complexity, and fuel modification distances are estimated based on the fire history; the amount and type of vegetation; the arrangement of the fuels; topography; local weather patterns; and construction, design, and placement of structures. The plan must also include an irrigation plan; a landscape plan; zone delineation for setbacks, irrigation, and thinning; and the identification of responsible parties for the plan's installation and maintenance.

### *Developer Fees*

In response to increasing demands for new facilities, equipment, and staffing created by new development, the County has implemented a Developer Fee Program to fund the purchase of fire station sites, the construction of new stations, and the funding of certain capital equipment in the high-growth areas of the County. The developer fees, which are currently \$0.8990 per square foot of new development in the Malibu/Santa Monica Mountains Area, \$1.0293 per square foot of new development in the Santa Clarita Valley Area, and \$0.8426 in the Antelope Valley Area (all land uses), are paid to the Consolidated Fire Protection District of Los Angeles County (Fire District). This Fire District developer fee is adjusted annually and is charged on all new development, including residential buildings, new detached residential accessory structures, new commercial buildings, and new additions over 2,000 square feet prior to building permit issuance.

### 5.14.1.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- FP-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services.

### 5.14.1.3 RELEVANT AREA PLAN GOALS AND POLICIES

The following is a list of the goals and policies of the Proposed Project that are intended to reduce potentially significant adverse effects concerning public services and facilities.

#### **Public Safety, Services and Facilities Element**

##### *Fire Hazards*

**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.

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- **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.

#### 5.14.1.4 ENVIRONMENTAL IMPACTS

The following impact analysis addresses thresholds according to Appendix G of the CEQA Guidelines. The applicable thresholds are identified in brackets after the impact statement.

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**Impact 5.14-1: Buildout of the Proposed Project would introduce new structures, residents, and employees into the LACoFD service boundaries, thereby increasing the requirement for fire protection facilities and personnel. [Threshold FP-1]**

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**Impact Analysis:** The Proposed Project provides land use designations that would increase population and housing within the Project Area. The population and housing increase projected under the Proposed Project would increase the demands on LACoFD to provide fire protection and emergency services. To maintain or achieve acceptable travel time standards for fire protection, it is reasonably foreseeable that the provision of new or physically altered fire facilities would be required, which would have the potential to result in adverse environmental impacts. Existing County policies and regulations and Proposed Project goals and policies are intended to reduce impacts associated with fire protection facilities. Specifically, the County has implemented a Developer Fee Program to fund the purchase of fire station sites, the construction of new stations, and the funding of certain capital equipment. As new development occurs, fees will be collected to ensure adequate levels of service for fire protection are maintained. Therefore, the Proposed Project is not anticipated to result in a potentially significant impact to fire protection or emergency services with construction or expansion of fire protection facilities and compliance with the mitigation measures listed below.

It should be noted that the Proposed Project land use changes do not allow more development to occur in VHFHSZs or more remote and rural areas that could be exposed to higher risks of fire hazards. The Proposed Project significantly reduces allowable development in the Project Area as compared to the Adopted Area Plan and directs growth to three designated Economic Opportunity Areas.

#### 5.14.1.5 CUMULATIVE IMPACTS

As discussed in Section 4.4, *Assumptions Regarding Cumulative Impacts*, the cumulative impact area for the Proposed Project is SCAG's North Los Angeles County Subregion, which includes all unincorporated areas of North Los Angeles County as well as the incorporated cities of Palmdale, Lancaster, and Santa Clarita. Cumulative growth within North Los Angeles County would result in a need for additional fire protection services to serve new development. Cumulative projects proposed under general plans of surrounding cities and counties, such as commercial, residential, or industrial projects, would require fire protection services

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from fire agencies within the region. In order to maintain adequate travel times to serve cumulative projects, the construction or expansion of fire protection facilities would be required, which would have the potential to result in an adverse impact on the environment. While the majority of cumulative projects involve discretionary actions and therefore would be required to demonstrate compliance with CEQA and/or NEPA prior to project approval, they would incrementally increase the need for fire services, which would have the potential to result in a significant cumulative impact. However, these impacts would be mitigated through the County's Developer Fee Program to fund the purchase of fire station sites, the construction of new stations, and the funding of certain capital equipment and compliance with the County Fire Code.

### 5.14.1.6 EXISTING REGULATIONS AND STANDARD CONDITIONS

#### State

- California Health and Safety Code (Section 13000 et seq.)
- California Code of Regulations (CCR) Title 24, Part 2 and Part 9
- California Public Resources Code (PRC) Sections 4201–4204
- State Responsibility Area (SRA) Fire Safe Regulations (Title 14 Natural Resources, Department of Forestry Fire Protection)

#### Los Angeles County Code of Ordinances

- Los Angeles County Fire Code, (Ord. 2010-0060 § 4, 2010; Ord. 2002-0080 § 4, 2002)

### 5.14.1.7 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, the following impacts would be **potentially significant**:

- **Impact 5.14-1** Buildout of the Proposed Project would introduce new structures, residents, and employees into the LACoFD service boundaries, thereby increasing the requirement for fire protection facilities and personnel.

### 5.14.1.8 MITIGATION MEASURES

#### Impact 5.14-1

- PS-1 Prior to issuance of building permits, future project applicants/developers shall pay the LACoFD Developer Fee in effect at that time.
- PS-2 Each subdivision map shall comply with the applicable County Fire Code requirements for fire apparatus access roads, fire flows, and fire hydrants. Final fire flows shall be determined by LACoFD in accordance with Appendix B of the County Fire Code. The required fire apparatus road and water requirements shall be in place prior to construction.

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PS-3 Prior to approval of a tentative map, a Fuel Modification Plan shall be prepared for each subdivision map in which urban uses would permanently adjoin a natural area, as required by Section 1117.2.1 of the County Fire Code, and approved by LACoFD prior to building permit issuance.

#### 5.14.1.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The existing regulatory programs and mitigation measures identified above would reduce potential impacts associated with fire protection to a level that is less than significant. Therefore, no significant unavoidable adverse impacts relating to fire protection remain.

### 5.14.2 Law Enforcement

#### 5.14.2.1 ENVIRONMENTAL SETTING

The Los Angeles County Sheriff's Department (LASD) provides for law enforcement throughout the entire Project Area, in addition to the cities of Palmdale and Lancaster, under contract services agreements. The Antelope Valley is served from two stations, one in Lancaster and one in Palmdale:

**Lancaster Station: 501 W. Lancaster Boulevard:** Station personnel cover an area of more than 600 square miles, including the contract city of Lancaster, and the communities of Lake Los Angeles, Quartz Hill, and Antelope Acres.

**Palmdale Station: 750 E. Avenue Q:** Palmdale Station provides police service for the contract city of Palmdale as well as 700 square miles of the Project Area from the Wrightwood ski area to Lake Hughes.

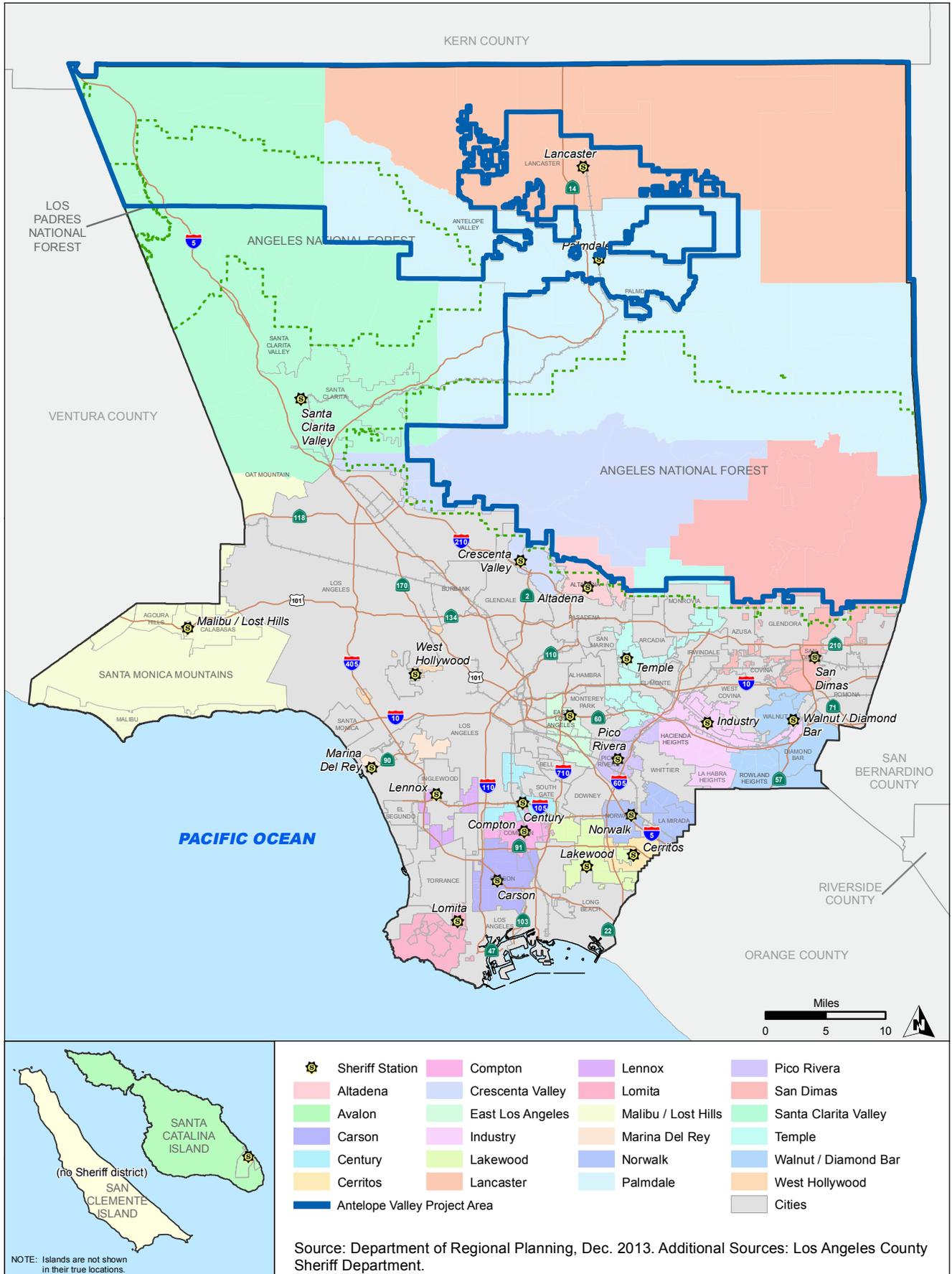
LASD is the largest sheriff's department in the United States, with a budget of \$2.8 billion and more than 17,000 employees. LASD provides general-service law enforcement to unincorporated areas of Los Angeles County, including the Project Area, serving as the equivalent of the county police for unincorporated areas, as well as cities within Los Angeles County that have contracted with the agency for law-enforcement services. Forty-two of the County's 88 municipalities contract with the Sheriff's Department to provide local police protection. The areas within the Project Area served by LASD are shown on Figure 5.14-2, *Sheriff's Department Service Areas*.

LASD also holds primary jurisdiction over facilities operated by the County, such as local parks, marinas, and government buildings; provides bailiff service for the Superior Court of Los Angeles County; operates the County jail system; and provides services, such as crime laboratories, homicide investigations, and academy training, to smaller law enforcement agencies within the County.

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FIGURE 5.14-2

## SHERIFF'S DEPARTMENT SERVICE AREAS



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LASD is also the second-largest transit police force in the United States, aside from the New York Police Department, through policing contracts of the Metro trains and buses of the Los Angeles Metropolitan Transportation Authority and Metrolink. Furthermore, with policing contracts with nine campuses of the Los Angeles Community College and Lancaster Community College District, the LASD is the largest community policing agency in the United States. The department's headquarters are located in the City of Monterey Park.

LASD staff has indicated that an officer-to-population ratio of one officer to every 1,000 residents provides the desired level of service for its service area. This ideal standard typically is applied in EIRs for proposed projects that are served by LASD's as a means to develop a rough assessment of the project's impacts on law enforcement services.

The LASD also has established an optimal service response time of 10 minutes or less for emergency response incidents (a crime that is presently occurring and is a life or death situation), 20 minutes or less for priority response incidents (a crime or incident that is currently occurring but which is not a life or death situation), and 60 minutes or less for routine response incidents (a crime that has already occurred and is not a life or death situation). These response times represent the range of time required to handle a service call, which is measured from the time a call is received until the time a patrol car arrives at the incident scene. Response time is variable, particularly because the nearest responding patrol car may be located anywhere within the station's patrol area and may not necessarily respond directly from the station itself.

### Regulatory Framework

#### *County*

#### ***Law Enforcement Fees for North Los Angeles County.***

On May 27, 2008, the County Board of Supervisors adopted law enforcement fees for north Los Angeles County. This mitigation fee is applicable to new residential, commercial, office, and industrial development located within some of the unincorporated areas of north Los Angeles County (Santa Clarita, Newhall, and Gorman). However, it is not applicable to the majority of the Project Area. In addition, the County approved capital improvement/construction plans for law enforcement facilities for north Los Angeles County. Each of the law enforcement facility areas will have a separate fee, and the amount of the fee will be set at a base level sufficient to provide, or contribute to, a turnkey law enforcement facility and corresponding equipment that is in direct proportion to the population increases from new development that warrant or contribute to the need for a new facility. In areas where a building is not required, the fee will be used to augment existing service capacity through the purchase of equipment directly to serve the new population.

The amount of the fee established must be reviewed annually by the Sheriff's Department in consultation with the County Auditor-Controller. On July 1 of each year, the fee in each law enforcement facility fee area must be adjusted based on the Engineering News Record-Building Construction Cost Index.

The related capital improvement/construction plans setting forth the approximate location, size, time of availability, and estimates of cost for the facilities and improvements to be financed with the fee for the Santa Clarita and Newhall areas will be annually updated by the County Board of Supervisors. However, as stated above, these fees are not applicable to the majority of the Project Area.

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#### 5.14.2.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

PP-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for law enforcement services.

#### 5.14.2.3 RELEVANT AREA PLAN GOALS AND POLICIES

The following is a list of the goals and policies of the Proposed Project that are intended to reduce potentially significant adverse effects concerning public services and facilities.

#### Public Safety, Services and Facilities Element

##### *Law Enforcement*

**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.

#### 5.14.2.4 ENVIRONMENTAL IMPACTS

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**Impact 5.14-2: Buildout of the Proposed Project would introduce new structures, residents, and employees into the LASD service boundaries, thereby increasing the requirement for law enforcement facilities and personnel. [Threshold PP-1]**

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**Impact Analysis:** Buildout of the Proposed Project would result in construction of residences (single- and multi-family) and nonresidential uses, including commercial, retail, office, business park uses, fire stations, schools, and open areas. The LASD would provide general law enforcement for the Project Area. It is anticipated that the demand for law enforcement services would increase substantially above current levels due to development pursuant to the Proposed Project and the resulting increase in population. At buildout,

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an additional 311,920 residents would be located in the Project Area and require law enforcement services. Without additional staffing and facilities, the projected population increase would decrease the existing level of service of the LASD. The need for additional staffing could result in the need to expand or construct new facilities to serve the additional population.

Using a desired officer-to-population ratio of one officer to every 1,000 residents, identified above, an additional 312 officers would be needed at buildout of the Proposed Project. As future development projects are implemented, LASD will review each project for potential impacts to their facilities and personnel. If determined to be necessary, mitigation will be imposed to fund capital facilities and equipment for the LASD. Currently, no mitigation fee has been adopted for the majority of the Project Area, which is expected to grow by 311,920 residents.

Operational funding for the LASD is derived from various types of tax revenue (property taxes, sales taxes, user taxes, vehicle license fees, deed transfer fees, etc.), which are deposited in the County's General Fund. The County Board of Supervisors then allocates the revenue for various County-provided public services, including Sheriff's services. As future development occurs, tax revenues from property and sales taxes would be generated and deposited in the County's General Fund and the State Treasury. A portion of these revenues would be allocated to the LASD during the County's annual budget process to maintain staffing and equipment levels to adequately serve project-related increases in service-call demands.

#### 5.14.2.5 CUMULATIVE IMPACTS

As discussed in Section 4.4, *Assumptions Regarding Cumulative Impacts*, the cumulative impact area for the Proposed Project is SCAG's North Los Angeles County Subregion, which includes all unincorporated areas in North Los Angeles County, as well as the incorporated cities of Palmdale, Lancaster, and Santa Clarita. Cumulative projects in North Los Angeles County would require increased law enforcement services to serve new development. Cumulative projects proposed under general plans of cities, such as commercial, residential or industrial projects, would require law enforcement services. The increase in demand for law enforcement services from implementation of cumulative projects would have the potential to result in the need to construct or expand existing police facilities, which would have the potential to create an adverse impact on the environment. While the majority of cumulative projects require discretionary actions and would be required to demonstrate compliance with CEQA and/or NEPA prior to project approval, they would incrementally increase the need for law enforcement services, which would have the potential to result in a significant cumulative impact. Operational funding for LASD and the police departments serving cities in Los Angeles County is derived from various types of tax revenue (property taxes, sales taxes, user taxes, vehicle license fees, deed transfer fees, etc.), which are deposited in the General Fund. Provided that staff and facilities are expanded to serve future development in the Project Area and cities, no significant cumulative impacts to law enforcement are anticipated.

#### 5.14.2.6 EXISTING REGULATIONS AND STANDARD CONDITIONS

There are no existing regulations or standard conditions related to law enforcement.

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#### 5.14.2.7 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

- Upon implementation of regulatory requirements and standard conditions of approval, the following impacts would be less than significant: 5.14-2.

#### 5.14.2.8 MITIGATION MEASURES

No mitigation measures are required.

#### 5.14.2.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Compliance with existing regulatory programs would reduce potential impacts to law enforcement to a level that is less than significant.

### 5.14.3 School Services

#### 5.14.3.1 ENVIRONMENTAL SETTING

The County's role in developing and managing educational facilities and programs is limited. However, the Los Angeles County Office of Education (COE), which is the largest regional education agency in the United States, serves as an intermediary between the local school districts and the California Department of Education. The COE is guided by a seven-member County Board of Education, which is appointed by the County Board of Supervisors. The COE provides a vision statement and strategic opportunities for educational facility development to coordinate the assessment of facility needs and the construction of schools that fall to individual school districts. (County of Los Angeles 2014)

Another role that the County plays in coordinating in public school facilities is through the County subdivision approval process, in which developers are required to assess the need for, and in some cases provide, land for the construction of public schools within their development. Development impact fees, based on the size of a development, are distributed to the appropriate school district for the construction of school facilities before the County issues any building permits. The County also receives population surveys from various school districts, but they are sporadic, and not all districts involve the County in their facilities planning.

The areas served by each school district are shown on Figure 5.14-3, *School Districts*. As shown on Table 5.14-2, there are a total of 143,941 students enrolled in public schools within the Districts serving the Project Area. The Project Area is served by a total of 17 school districts.

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**Table 5.14-2 Project Area Public School Enrollment (2013)**

Acton-Agua Dulce Unified (School District)	1,542
Antelope Valley Union High (School District)	24,816
Azusa Unified (School District)	9,755
Bonita Unified (School District)	9,870
Claremont Unified (School District)	7,018
Eastside Union Elementary (School District)	3,386
Glendora Unified (School District)	7,559
Gorman Elementary (School District)	1,740
Hughes-Elizabeth Lakes Union Elementary (School District)	281
Keppel Union Elementary (School District)	2,747
La Canada Unified (School District)	4,119
Lancaster Elementary (School District)	14,713
Palmdale (School District)	21,264
Pasadena Unified (School District)	19,540
Sulphur Springs (School District)	5,553
Westside Union Elementary (School District)	8,645
Wilsona Elementary (School District)	1,393
<b>TOTAL</b>	<b>143,941</b>
Source: kidsdata.org	

## Regulatory Framework

State regulations, plans, or guidelines related to schools that are potentially applicable to the Proposed Project are summarized below.

### *State*

#### ***Senate Bill 50***

SB 50, also known as Proposition 1A, codified in California Government Code Section 65995 et seq.) was enacted in 1988 to address how schools are financed and how development projects may be assessed for associated school impacts. SB 50 sets forth the “exclusive methods of considering and mitigating impacts on school facilities” resulting from any state or local planning and/or development project, regardless of whether its character is legislative, adjudicative, or both. (Govt. Code § 65996[a]). Section 65995 provides that “[t]he payment or satisfaction of a fee, charge, or other requirement levied or imposed pursuant to Section 17620 of the Education Code in the amount specified in Section 65995 ... are hereby deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving but not limited to, the planning, use, or development of real property, or any change in governmental organization... on the provision of adequate school facilities.” (Govt. Code § 65995[h]). The reference in Section 65995(h) to fees “imposed pursuant to Section 17620 of the Education Code in the amount specified in Section 65995” is a reference to per-square-foot school fees that can be imposed by school districts on new residential and commercial and industrial construction at three levels, as follows:

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- **Level 1 Fee:** Education Code Section 17620 provides the basic authority for school districts to levy fees against construction for purposes of funding construction or reconstruction of school facilities, subject to limits set forth in Government Code Section 65995. Fees are charged based on “assessable space,” which includes all of the square footage within the perimeter of a structure.
- **Level 2 Fee:** The alternative school fee that may be collected pursuant to Government Code Section 65995.5. Certain requirements in accordance with Government Code Section 65995.5 have to be met to collect this level of fees.
- **Level 3 Fee:** The alternative school fee that may be collected pursuant to Government Code Section 65995.7. This fee is collected only when the State Allocation Board is no longer approving apportionments for new construction funding.

#### 5.14.3.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- SS-1            Result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for school services.

#### 5.14.3.3 RELEVANT AREA PLAN GOALS AND POLICIES

##### Public Safety, Services and Facilities Element

###### *Schools*

The following is a list of the goals and policies of the Proposed Project that are intended to reduce potentially significant adverse effects concerning schools.

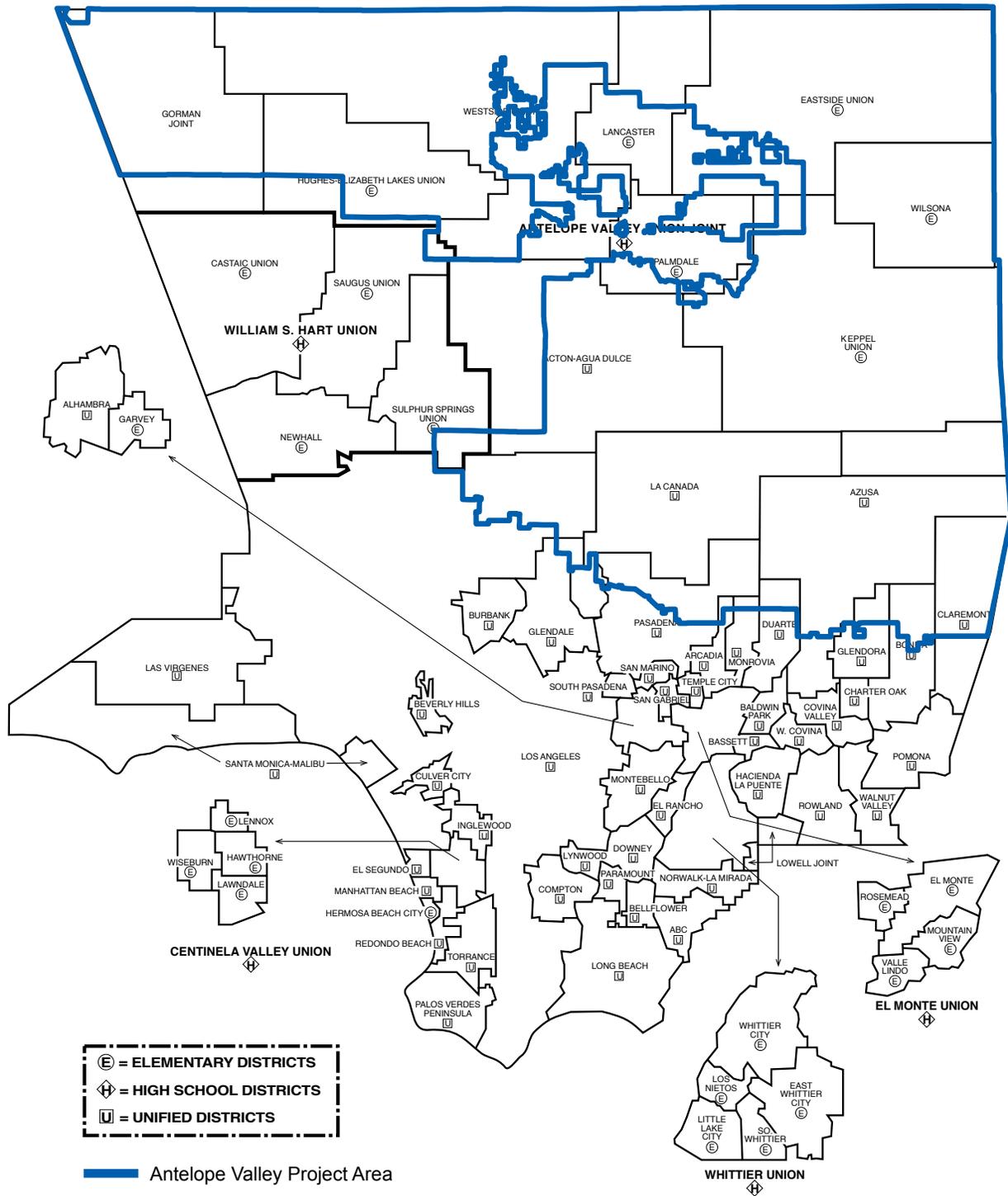
**Goal PS 10:** A wide range of educational opportunities for Antelope Valley residents.

- **Policy PS 10.1:** Coordinate with all Antelope Valley school districts to ensure that new schools are provided as additional development occurs or as the population grows.
- **Policy PS 10.2:** Encourage new schools to locate in rural town center areas, rural town areas, and economic opportunity areas, where appropriate, where they will be accessible by pedestrian walkways, trails, bikeways, and bicycle routes.
- **Policy PS 10.3:** Encourage new schools to locate near parks and recreational facilities.

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FIGURE 5.14-3

## SCHOOL DISTRICTS



Source: Los Angeles County Office of Education, 2013. Public Schools Directory

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- **Policy PS 10.4:** Encourage the use of school playgrounds and sporting fields for community recreation (“joint use”) when school is not in session.
- **Policy PS 10.5:** Promote the creation of a four-year public university in the Antelope Valley to provide opportunities for continuing education and workforce development.

5.14.3.4 ENVIRONMENTAL IMPACTS

**Impact 5.14-3: Buildout of the Proposed Project would generate new students who would impact the school enrollment capacities of area schools. [Threshold SS-1]**

**Impact Analysis:** Educational facilities within the Project Area have their own state-mandated requirements to ensure a high quality of life for all the citizens of the County. School districts offer education to all school-age residents of the region, but operate entirely independent of County government. School districts were created by the State and are subject to the overview of the State Legislature. Elected governing school boards are responsible for budgeting and decision-making. The State Department of Education establishes school site and construction standards.

Table 5.14-3 identifies the housing units and student population projected for the Project Area. As shown in Table 5.14-3, a total of 57,009 additional students are anticipated at buildout of the Proposed Project. The Proposed Project would result in housing and population growth throughout the Project Area, which would result in an increase in school enrollment. To maintain acceptable service ratios, the construction of new or expanded school facilities would be required.

**Table 5.14-3 Project-Related Student Population Increases**

Area Plan	Existing Units	Projected Units	Increase over Existing	Student Generation Rate	Projected Number of Additional Students
Antelope Valley	24,739	106,180	81,441	0.7	57,009

Note:  
 The student generation rate of 0.7 students per unit (K-12) was provided by the California Department of Education, Office of Public School Construction.

Implementation of the Proposed Project could contribute to a potentially significant adverse cumulative impact on school facilities and services. However, under state law, development projects are required to pay established school impact fees in accordance with SB 50 at the time of building permit issuance. The funding program established by SB 50 has been found by the Legislature to constitute “full and complete mitigation of the impacts of any legislative or adjudicative act...on the provision of adequate school facilities” (Government Code Section 65995[h]). The fees authorized for collection under SB 50 are conclusively deemed full and adequate mitigation of impacts on school district facilities. Therefore, the increase in the demand for school facilities and services due to implementation of the Proposed Project would be adequately mitigated by the payment of SB 50 fees.

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#### 5.14.3.5 CUMULATIVE IMPACTS

Cumulative development projects that involve residential development would increase the public school population in the region and require the construction or expansion of school facilities so that adequate service ratios are maintained. As described in Section 4.4, *Assumptions Regarding Cumulative Development*, an additional 103,605 dwelling units are anticipated by 2035 within the North Los Angeles County Subregion. This would result in an additional 72,524 students. This increase in student population would require the construction or expansion of school facilities, which would result in adverse environmental impacts. While the majority of cumulative projects require discretionary actions and would be required to demonstrate compliance with CEQA and/or NEPA prior to project approval, they would incrementally increase the need for school facilities, which would have the potential to result in a significant cumulative impact.

As discussed above, under state law, development projects are required to pay established school impact fees in accordance with SB 50 at the time of building permit issuance. The funding program established by SB 50 has been found by the Legislature to constitute “full and complete mitigation of the impacts of any legislative or adjudicative act...on the provision of adequate school facilities” (Government Code Section 65995[h]). The fees authorized for collection under SB 50 are conclusively deemed full and adequate mitigation of impacts on school district facilities. Therefore, the increase in the demand for school facilities and services due to cumulative development would be adequately mitigated to a less than significant level by the payment of SB 50 fees.

#### 5.14.3.6 EXISTING REGULATIONS AND STANDARD CONDITIONS

- Senate Bill 50 (“SB 50,” also known as Proposition 1A, codified in California Government Code Section 65995 et seq.)

#### 5.14.3.7 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements and standard conditions of approval, the following impacts would be less than significant: 5.14-3.

#### 5.14.3.8 MITIGATION MEASURES

No mitigation measures are required.

#### 5.14.3.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant impacts have been identified, and no significant and unavoidable impacts would occur.

### 5.14.4 Library Services

#### 5.14.4.1 ENVIRONMENTAL SETTING

The County Public Library is one of the largest public library systems in the United States. In fiscal year 2011–2012, library staff circulated 16.5 million items to 3.1 million cardholders; answered over 8 million reference questions; provided 18,000 programs to 500,000 children, teens, and adults; and assisted the public

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with 3 million internet sessions on the library's public access computers. The library system is a special fund County department operating under the direction of the County Board of Supervisors. Figure 5.14-4 identifies the County libraries and facilities serving the Project Area.

Supplementing the 7.5-million-volume book collection, the library also offers magazines, newspapers, microfilm, government publications, specialized reference materials, magazines, audio-visual media, adult, teen and children programs, downloadable audio and e-books, and internet access, including WiFi.

### Library Facility Needs

The majority of the County's 86 libraries are undersized and understocked to meet the service needs of current and projected populations served by the Library system. A study conducted by the Library in April 2001 determined that many of the County's libraries do not meet basic facility and service planning guidelines. The current guideline for library facility space is a minimum of 0.5 gross square foot per capita. The 2001 study determined that 89 percent of existing libraries will not meet that standard in the year 2020. In addition, the study determined that by 2020, 77 percent of existing libraries will not meet the Library's current service level planning guideline of 2.75 items (books and other library materials) per capita.

Many existing County libraries are located in areas with little or no new residential development, and therefore, there are no mitigation fees or other reliable sources of capital funding available to replace or expand them. A permanent source of funding to replace or expand existing facilities is needed to meet the projected population growth in the Library's service areas over the next two decades.

### Library Facilities Mitigation Fees

The County applies a library facilities mitigation fee to new residential developments in the unincorporated areas. This fee is intended to mitigate the significant adverse impacts of increased residential development on the Library system. The library facilities mitigation fee is based on the estimated cost of providing the projected library facility needs in each library planning area. Section 22.72.030 of the County's Zoning Code identifies the library facilities mitigation fee in each of the seven library planning areas.

The mitigation fee in each planning area is reviewed annually by the County Librarian, in consultation with the County Auditor-Controller, and is adjusted every July 1. According to the Zoning Code, no adjustment shall increase or decrease the fee to an amount more or less than the amount necessary to recover the cost of providing applicable library facilities and services.

The provisions of the Library Facilities Mitigation Fee Ordinance are applicable to residential projects only. All library facilities mitigation fees received by the County are deposited into a special library capital facilities fund (one for each library planning area) and expended solely for the purposes for which the fees were collected.

#### 5.14.4.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

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LS-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for library services.

#### 5.14.4.3 RELEVANT AREA PLAN GOALS AND POLICIES

The following is a list of the goals and policies of the Proposed Project that are intended to reduce potentially significant adverse effects concerning libraries.

#### Public Safety, Services and Facilities Element

##### *Libraries*

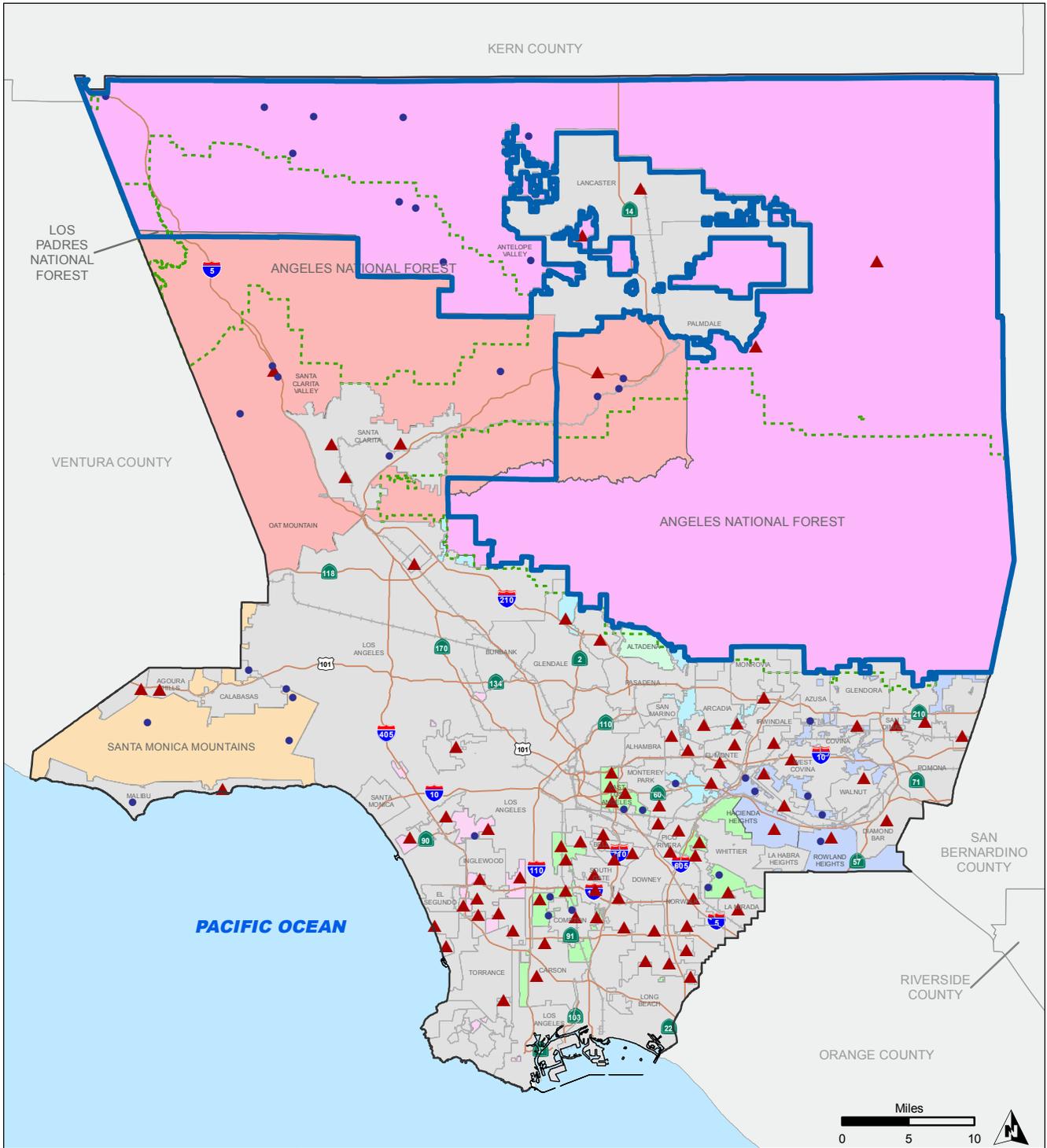
**Goal PS 11:** Antelope Valley residents enjoy easy access to public library services.

- **Policy PS 11.1:** Maintain existing public libraries and make improvements as necessary. Ensure adequate funding on an ongoing basis.
- **Policy PS 11.2:** Expand public library collections and services to meet community needs.
- **Policy PS 11.3:** Provide new public libraries as additional development occurs or as the population grows.
- **Policy PS 11.4:** Encourage new public libraries to locate in rural town center areas, rural town areas, and economic opportunity areas, where appropriate, where they will be accessible by pedestrian walkways, trails, bikeways, and bicycle routes.
- **Policy PS 11.5:** Provide bookmobile services in areas that are not served by permanent public libraries.
- **Policy PS 11.6:** Encourage the use of technology in library operations to increase efficiency and accessibility.

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FIGURE 5.14-4

## LIBRARIES



Altadena Service Planning Area	Bookmobile Stop
Antelope Valley Service Planning Area	Library Sites
East San Gabriel Valley Service Planning Area	Unincorporated Areas
Santa Clarita Valley Service Planning Area	Cities
Santa Monica Mountains Service Planning Area	Antelope Valley Project Area
Southeast Service Planning Area	
Southwest Service Planning Area	
West San Gabriel Valley Service Planning Area	

Source: Department of Regional Planning, March, 2014. Additional Sources: Los Angeles County Public Library, March, 2014

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### 5.14.4.4 ENVIRONMENTAL IMPACTS

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**Impact 5.14-4: Buildout of the Proposed Project would generate additional population, increasing the service needs for the local libraries. [Threshold LS-1]**

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**Impact Analysis:** Implementation of the Proposed Project would result in the potential for increased demand for library services within the Project Area to the extent that expansion and construction of new facilities would be required. The projected increase in population at buildout of the Proposed Project is 311,920 persons. As discussed above, the current guideline for library facility space is a minimum of 0.5 gross square foot per capita and 2.75 items (books and other library materials) per capita. To adequately serve future residents within the Project Area, the County library system would need to add 857,780 library items and 155,960 square feet of library space.

Future development would generate new tax revenues, and as noted above, funding sources for the County Library consist of property taxes, state assistance, and revenue from fines, fees, and other miscellaneous revenue. According to County Library staff, increased tax revenues funding addresses only library operations, and because of uncertainty regarding General Fund contribution levels, it is not adequate to offset the impact of the project on the County Library's ability to construct new libraries and purchase new items (books, periodicals, audio cassettes, videos, etc.). Consequently, the tax revenues collected would not adequately cover all the costs of serving the project population, and a significant impact on the library system would result.

In order to minimize potentially adverse effects, the County has devised library facilities mitigation fee programs, and future residential projects would be required to remit payment pursuant to the Countywide program to account for library-related construction and acquisition costs. Requiring payment of the library facilities fee in effect at the time development occurs (currently \$718.00 per unit of residential development) would mitigate project-related impacts on the County Library to a less-than-significant level.

### 5.14.4.5 CUMULATIVE IMPACTS

The County Public Library serves the North Los Angeles County Subregion. Cumulative projects that involve residential development would increase the population of library users and result in the need to construct additional or renovate existing library facilities, which would result in a significant environmental impact. Cumulative projects that would contribute to additional library use include residential development proposed under the general plans of cities as well as implementation of the Proposed Project. The increase in demand for library services from implementation of cumulative projects would result in the need to construct additional or expand existing library facilities, which would create an adverse impact on the environment. While the majority of cumulative projects require discretionary actions and would be required to demonstrate compliance with CEQA prior to project approval, they would incrementally increase the need for library facilities and materials, which would have the potential to result in a significant cumulative impact.

Future cumulative development would generate new tax revenues, and as noted above, funding sources for the County Library and city libraries consist of property taxes, state assistance, and revenue from fines, fees, and other miscellaneous revenue. In order to minimize potentially adverse effects, the County has devised library facilities mitigation fee programs, and future projects would be required to remit payment pursuant to

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the Countywide program to account for library-related construction and acquisition costs. Requiring payment of the library facilities fee in effect (currently \$718.00 per unit of residential development) would mitigate cumulative impacts on the County Library to a less-than-significant level, and they are therefore not cumulative considerable.

#### 5.14.4.6 EXISTING REGULATIONS AND STANDARD CONDITIONS

- Library facilities mitigation fee (developer fee) codified as Chapter 22.72 of the Los Angeles County Code.

#### 5.14.4.7 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements and standard conditions of approval, the following impacts would be less than significant: 5.14-4.

#### 5.14.4.8 MITIGATION MEASURES

No mitigation measures are required.

#### 5.14.4.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant impacts have been identified, and no significant and unavoidable impacts would occur.

### 5.14.5 References

Department of Regional Planning. 2014. Draft 2035 General Plan Update. Los Angeles County, California.

Los Angeles, County of, Fire Department. 2013 Statistical Summary. 2013. Los Angeles County, California.

Southern California Association of Governments (SCAG).2012, April.2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).<http://rtpscsc.scag.ca.gov/Pages/default.aspx>.