This section of the Program Environmental Impact Report (PEIR) describes the public services in the Southern California Association of Governments (SCAG) region, discusses the potential impacts of the proposed 2016 Regional Transportation Plan/Sustainable Communities Strategy (“2016 RTP/SCS,” “Plan,” or “Project”) on public services, identifies mitigation measures for the impacts, and evaluates the residual impacts. Public services were evaluated in accordance with Appendix G of the 2015 State California Environmental Quality Act (CEQA) Guidelines. Public services within the SCAG region were evaluated at a programmatic level of detail in relation to the general plans of the six counties and the 191 cities within the SCAG region, a review of related literature germane to the SCAG region, as well as a review of SCAG’s 2012 RTP/SCS PEIR.1

Southern California is home to significant natural disasters, including earthquakes, wildfires, flooding, and mudslides. Although natural disasters, such as earthquakes and hurricanes, have produced significant regional casualties and property damage, none had the serious disruption to national travel and the national economy as the September 11, 2001, terrorist attacks. The 9/11 attacks created a new awareness of the vulnerabilities of transportation fleets and facilities. As concern about the threat of terrorism and consequences of natural disasters has grown, government (at all levels) has taken new measures to secure the welfare of its citizens. Transportation and transit agencies throughout the United States are taking increasing steps to protect their facilities against the threats of crime, terrorist activity, and natural disasters. The complexity of the SCAG region, with a range of potential terrorism targets, presents significant challenges in coordinating and implementing effective homeland security programs. The unexpected and complex nature of these natural and human-caused incidents require extensive coordination, collaboration, and flexibility among all of the agencies and organizations involved in planning, mitigation, response, and recovery.

The provision of public services in the SCAG region is accomplished through cooperation among a range of federal, state, regional, and local government agencies and nongovernmental organizations. Given the focus of the RTP/SCS on transportation planning and sustainable community strategies, the evaluation of public services focuses here emergency preparedness, emergency response, and security related to major modes of travel and protection and support of the communities in the SCAG region. The Governor’s Office of Emergency Services (CalOES) is responsible for overall state agency response to disasters and ensuring the state’s readiness to respond to and recover from all hazards and to assist local governments in their emergency response preparedness, response, recovery, and mitigation. The provision of emergency preparedness, emergency response services is provided through federal, state, and local entities including the Transportation Security Administration (TSA), the Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA), the California Department of Forestry and Fire Protection (CAL FIRE), the California Highway Patrol (CHP), and County and City fire, emergency response, and security departments. Although the RTP/SCS does not include planning guidelines related to provision of schools, it does consider the relationship of transportation projects and goods movement in relation to schools; therefore this analysis describes the key regulations related to funding and siting of schools, and characterizes the distribution of schools in the SCAG region.

Definitions

**California Department of Forestry and Fire Protection (CAL FIRE):** CAL FIRE is an emergency response and resource protection department that protects lives, property, and natural resources from fire; responds to emergencies of all types, and protects and preserves timberlands, wildlands, and urban forests throughout the State of California, through cooperative efforts via contracts and agreements between state, federal, and local agencies to respond to emergencies including wildland and structure fires, earthquakes, floods, hazardous material spills, medical aids, and terrorist attacks.  

**California Emergency Management Agency (EMA):** The EMA was established as part of the Governor’s Office in 1950 as the State Office of Civil Defense. Then called the Governor’s Office of Emergency Services, it coordinated overall state agency response to major disasters in support of local government. The EMA is responsible for assuring the state’s readiness to respond to and recover from natural, human-made, and war-caused emergencies, and for assisting local governments in their emergency preparedness, response, and recovery efforts. The EMA serves as the central contact point in the state for any emergency or imminent disaster. It coordinates the notification of appropriate state administering agencies that may be required to respond, as well as the emergency activities of all state agencies in the event of an emergency. In doing so, the EMA does not focus on security specifically, but rather more broadly on addressing all potential incidents that could impact the state, such as earthquakes, fires, floods, and terrorist attacks. Furthermore, EMA coordinates with federal agencies, such as the DHS and FEMA, as well as other state and local agencies such as the CHP. California’s vision, mission, and principles for emergency management, as well as goals and objectives are located in its publication “Strategic Plan 2010-2015 – Keeping California Safe.”

**California Highway Patrol (CHP):** The CHP was created in 1929 to provide uniform traffic law enforcement throughout the state. The primary purpose of the CHP is to assure the safe, convenient, and efficient transportation of people and goods on the state’s highway system in accordance with CHP’s mission to provide the highest level of safety, service, and security.

**County Offices of Emergency Services (OES):** The County OESs provide emergency management and preparedness services to the unincorporated areas of the six counties within the SCAG region. Each OES is responsible for alerting and notifying appropriate agencies when disaster strikes, coordinating all agencies that respond, ensuring resources are available and mobilized in times of disaster, developing plans and procedures for response to and recovery from disasters, and developing and providing preparedness materials for the public. These responders include fire departments, police and sheriff department, hospitals, ambulance services, and transportation agencies. Coordination among public and private agencies within various cities and counties make the most use of all available resources in the event of any emergency. While each city and county has its own security procedures, the policies are generally similar. Mutual Aid agreements between cities, counties, and private organizations help to maximize resources and reduce the human suffering associated with disaster situations.

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Federal Emergency Management Agency (FEMA): FEMA is a federal agency that has served America since 1979 to support U.S. citizens and first responders to ensure that the nation works together to build, sustain, and improve its capacity to prepare for, protect against, respond to, recover from, and mitigate all hazards.\(^5\) FEMA coordinates the federal government’s role in preparing for, preventing, mitigating the effects of, responding to, and recovering from all domestic disasters, whether natural or man-made, including acts of terror. FEMA is part of the DHS.

Governor’s Office of Emergency Services (CalOES): CalOES is the state agency charged with the responsibility to assist local government in preparing for and responding to any type of natural or manmade disaster in California. CalOES protects the lives and property, build capabilities, and supports communities for a resilient California. CalOES has six goals relevant to public services: (1) anticipate and enhance prevention and detection capabilities to protect the state from all hazards and threats; (2) strengthen California’s ability to plan, prepare for, and provide resources to mitigate the impacts of disasters, emergencies, crimes, and terrorist events; (3) effectively respond to and recover from both human-caused and natural disasters; (4) enhance the administration and delivery of all state and federal funding, and maintain fiscal and program integrity; (5) develop a united and innovative workforce that is trained, experienced, knowledgeable, and ready to adapt and respond; and (6) strengthen capabilities in public safety communication services and technology enhancements.

Master Mutual Aid Agreements: FEMA has encouraged federal, state, local, and tribal governments to enter into agreements to assist one another.

Mutual Aid Agreements (MAA): Immediately following the 1994 Northridge earthquake, city and county emergency managers in the CalOES coastal, southern, and inland regions developed a coordinated emergency management concept called the Emergency Managers Mutual Aid (EMMA) system. The purpose of EMMA is to support disaster operations in affected jurisdictions by providing professional emergency management personnel from unaffected areas to support local jurisdictions, Operational Areas, and regional emergency operations during proclaimed emergencies; providing a system, including an organization, information, and forms necessary to coordinate the formal request, reception, assignment, and training of assigned personnel; establishing a structure to maintain this document (the Emergency Managers Mutual Aid Plan) and its procedures; providing for the coordination of training for emergency managers, including Standardized Emergency Management System (SEMS/NIMS) training, emergency management course work, exercises, and disaster response procedures; and promoting professionalism in emergency management.

National Incident Management System/Standardized Emergency Management System (NIMS): The NIMS is a tool for states, counties and local jurisdictions to respond to catastrophic events through better communication and coordination. NIMS provides a consistent nationwide template to enable Federal, state, local, and tribal governments and private sector and nongovernmental organizations to work together effectively and efficiently to prepare for, prevent, respond to, and recover from domestic incidents, regardless of cause, size, or complexity, including acts of catastrophic terrorism.

National Preparedness System (NPS): The NPS, also a part of FEMA, is a part of NIM. The NPS is intended to be used by individuals, families, communities, the private and nonprofit sectors, faith-based

organizations, and local, state, tribal, territorial, insular area, and federal governments to achieve the National Preparedness Goal.

Transportation Management Centers (TMCs): The California Department of Transportation (Caltrans), in conjunction with the CHP, has created TMCs to rapidly detect and respond to incidents while managing the resulting congestion. For the SCAG region, Caltrans Districts 7, 8, 11, and 12 all have TMCs.

Security: the protection of persons or property from intentional damage or destruction caused by vandalism, criminal activity or terrorist attacks.

Transportation Security Administration (TSA): The TSA is a component of the DHS and is responsible for security of the nation’s transportation systems. The TSA is responsible for security at airports in the SCAG region. With state, local, and regional partners, the TSA oversees security for highways, railroads, buses, mass transit systems, and ports. A vast majority of its resources are dedicated to aviation security and is primarily tasked with screening passengers and baggage.

Unified Coordination Group (UCG): Unified Coordination Group (UCG) is a temporary Federal multi-agency coordination center established locally to facilitate field-level domestic incident management activities related to prevention, preparedness, response and recovery when activated by the Secretary of Homeland Security. The JFO provides a central location for coordination of federal, state, local, tribal, nongovernmental and private-sector organizations with primary responsibility for activities associated with threat response and incident support.

United States Coast Guard: The Coast Guard is both a federal law enforcement agency and a military force that operates as part of the DHS in times of peace to enforce the nation’s laws at sea, protecting the marine environment, guarding the nation’s vast coastlines and ports, and performing vital lifesaving missions. In times of war, or at the direction of the president, the Coast Guard serves as part of the Navy Department, defending the nation against terrorism and foreign threats. Since September 2001, the United States Coast Guard has assumed a dynamic role in protecting major ports. In addition, over 3,500 volunteer Coast Guard Auxiliary members assist in many Coast Guard mission areas, including Boating Safety and Search and Rescue.

United States Department of Defense (DOD): In the case of a large-scale emergency, the DOD is authorized to provide resources when response and recovery requirements are beyond the capabilities of civilian authorities and these efforts do not interfere with the DOD’s core mission or ability to respond to operational contingencies. Requests for Defense Support to Civilian Authorities (DSCA) are made through the local, county, and state authorities as a request for assistance to the federal coordinating official in the appropriate lead federal agency and is normally accompanied by, or submitted after a request from the governor for a disaster declaration from the president. The California National Guard may be activated as part of the DSCA and can provide law enforcement support, crisis management, and consequence management services. Activation of the National Guard for local support during emergencies is done by the governor via CalOES.

United States Department of Homeland Security (DHS): The DHS was established after the September 11, 2001, terrorist attacks as an office to oversee and coordinate a comprehensive national strategy to
safeguard the country against terrorism and respond to any future attacks. In 2003, DHS formally became a Cabinet-level department to further coordinate and unify national homeland security efforts. The vision of DHS is to ensure a homeland that is safe, secure, and resilient against terrorism and other hazards.

3.15.1 REGULATORY FRAMEWORK

The federal government sets public service standards for transportation-related security services and educational services that are closely linked to interstate commerce, such as aircraft, locomotives, and trucks. The state sets public service standards for fire response, police protection, public education, and security services. The provision of new public service facilities associated with population growth and development projects are generally subject to local general plan policies.

Federal

**Tariff Act of 1790**

The Tariff Act of 1790 was signed by President George Washington on August 10, 1790, to authorize the construction of 10 vessels (the Revenue Cutter Service) to enforce federal tariff and trade laws and to prevent smuggling. In 1915, the Revenue Cutter Service merged with the U.S. Life-Saving Service, and was officially renamed the U.S. Coast Guard, the only maritime service dedicated to saving life at sea and enforcing the nation’s maritime laws. In the 1900s, the Coast Guard also became responsible for maritime navigation, merchant marine licensing, and merchant vessel safety. In 2003, the Coast Guard was transferred to the Department of Homeland Security, where it currently serves.

**Aviation and Transportation Security Act**

The Aviation and Transportation Security Act (Public Law 107-71) was passed by the 107th Congress and signed on November 19, 2001, to establish the TSA in order to prevent terrorist acts associated with transportation systems after the September 11, 2001, terrorist attacks. The TSA is a component of the DHS and is responsible for security of the nation’s transportation systems. With state, local, and regional partners, the TSA oversees security for highways, railroads, buses, mass transit systems, and ports. A vast majority of its resources are dedicated to aviation security and is primarily tasked with screening passengers and baggage.

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Elementary and Secondary Education Act of 1965 and No Child Left Behind Act of 2001

Since the Elementary and Secondary Education Act (ESEA) of 1965 (Public Law 89-10) was signed into law by President Lyndon B. Johnson, local school districts throughout the nation have received federal monies through grants to state educational agencies to improve the quality of elementary and secondary education. ESEA also offered new grants to districts serving low-income students and for text and library books, created special education centers, and created scholarships for low-income collect students. In 2002, Congress reauthorized ESEA and President George W. Bush signed the law under a new name: No Child Left Behind (NCLB), which put in place measures that exposed achievement gaps among traditionally underserved and vulnerable students and their peers, and started an important national dialogue on educational improvement. As with ESEA, NCLB requires local school districts that have received federal funding to meet federal requirements and receive oversight.

Homeland Security Act of 2002

The DHS was established on November 25, 2002, by the Homeland Security Act of 2002 (6 U.S. Code [USC] 101). The DHS is charged with the responsibility of protecting the territory of the United States from terrorist attacks and responding to natural disasters. The primary mission of the Department is to (1) prevent terrorist attacks within the United States; (2) reduce the vulnerability of the United States to terrorism; and (3) minimize the damage, and assist in the recovery, from terrorist attacks that do occur within the United States. There are five homeland security missions:10

1. Prevent terrorism and enhancing security
2. Secure and manage borders
3. Enforce and administer immigration laws
4. Safeguard and secure cyberspace
5. Ensure resilience to disasters

Executive Order 12127 – Federal Emergency Management Agency

On April 1, 1979, President Jimmy Carter signed Executive Order 12127 to create FEMA, a federal agency committed to protecting and serving the American people pursuant to its mission to support our citizens and first responders to ensure that as a nation we work together to build, sustain and improve our capability to prepare for, protect against, respond to, recover from and mitigate all hazards.11 In March 2003, FEMA became a department of the DHS. The primary mission of FEMA is to reduce the loss of life and property and protect the nation from all hazards, including natural disasters, acts of terrorism, and other human-made disasters, by leading and supporting the nation in a risk-based, comprehensive emergency management system of preparedness, protection, response, recovery, and mitigation. FEMA has five mission areas. These have been identified in the National Preparedness Goal, released in September 2011. The National Preparedness Goal states: “A secure and resilient nation with the

capabilities required across the whole community to prevent, protect against, mitigate, respond to, and recover from the threats and hazards that pose the greatest risk.”

These risks include events such as natural disasters, disease pandemics, chemical spills and other manmade hazards, terrorist attacks and cyber-attacks.

FEMA’s five mission areas are as follows:

- **Prevention.** Prevent, avoid or stop an imminent, threatened or actual act of terrorism.
- **Protection.** Protect our citizens, residents, visitors, and assets against the greatest threats and hazards in a manner that allows our interests, aspirations, and way of life to thrive.
- **Mitigation.** Reduce the loss of life and property by lessening the impact of future disasters.
- **Response.** Respond quickly to save lives, protect property and the environment, and meet basic human needs in the aftermath of a catastrophic incident.
- **Recovery.** Recover through a focus on the timely restoration, strengthening and revitalization of infrastructure, housing and a sustainable economy, as well as the health, social, cultural, historic and environmental fabric of communities affected by a catastrophic incident.

The NIMS is administered under FEMA. The NIMS is a tool for states, counties, and local jurisdictions to respond to catastrophic events through better communication and coordination. NIMS provides a consistent nationwide template to enable federal, state, local, and tribal governments and private sector and nongovernmental organizations to work together effectively and efficiently to prepare for, prevent, respond to, and recover from domestic incidents, regardless of cause, size, or complexity, including acts of catastrophic terrorism.

California has a similar management system called the Standard Emergency Management System (SEMS) which is mandated under California Government Code Section §8607(a). State of California Executive Order S205 requires the state to integrate, to the extent appropriate, the NIMS, into the state’s SEMS.


The National Response Framework (NRF) is an essential component of the National Preparedness System mandated in Presidential Policy Directive 8: National Preparedness (PPD-8). PPD-8 is aimed at strengthening the security and resilience of the United States through systematic preparation for the threats that pose the greatest risk to the security of the Nation. PPD-8 defines five mission areas—Prevention, Protection, Mitigation, Response, and Recovery—and mandates the development of a series of policy and planning documents to explain and guide the Nation’s collective approach to ensuring and enhancing national preparedness. The NRF presents the guiding principles that enable all response partners to prepare for and provide a unified national response to disasters and emergencies. It

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establishes a comprehensive, national, all-hazards approach to domestic incident response. The National Response Plan was replaced by the NRF effective March 22, 2008 and updated in May 2013. The NRF defines the principles, roles, and structures that organize how we respond as a nation. The NRF:

- Describes how communities, tribes, states, the federal government, private-sectors, and nongovernmental partners work together to coordinate national response;
- Describes specific authorities and best practices for managing incidents; and
- Builds upon the NIMS, which provides a consistent template for managing incidents.

State

California Education Code

School facilities and services are subject to the rules and regulations of the California Education Code and governance of the State Board of Education (SBE). The SBE is the 11-member governing and policy making body of the California Department of Education (CDE) that sets K–12 education policy in the areas of standards, instructional materials, assessment, and accountability. The CDE and the State Superintendent of Public Instruction are responsible for enforcing education law and regulations; and for continuing to reform and improve public elementary school, secondary school, and child care programs, as well as adult education and some preschool programs. The CDE’s mission is to provide leadership, assistance, oversight, and resources so that every Californian has access to an education that meets world-class standards. The core purpose of the CDE is to lead and support the continuous improvement of student achievement, with a specific focus on closing achievement gaps.

Community Facilities Act of 1982, as amended

The Community Facilities Act of 1982 (Section 53324 of the Government Code), also commonly known as the Mello-Roos Act, enables certain public agencies to designate a Mello-Roos Community Facilities District, which allows for the financing of public improvements and services. These include basic infrastructure, police protection, fire protection, ambulance services, schools, parks, libraries, museums, and other cultural facilities. Mello-Roos Community Facilities Districts are usually created to finance improvements and services when no other funding sources are available, and require a two-thirds majority vote of residents living within the proposed boundaries. They are used especially often (but not exclusively) in new development areas. Upon approval, a special tax lien is placed against each property in the district, and residents pay a special tax each year. This tax is not based on property value, but on formulas that take into account physical characteristics such as square footage and structure size.

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California Government Code Section 65995

California Government Code Section 65995 is found in Title 7, Chapter 4.9. California Government Code Section 65995 authorizes school districts to collect impact fees from developers of new residential and commercial/industrial building space. In 1998, the California legislature passed Senate Bill (SB) 50, that amended Government Code Section 65995 in 1998. Under the provisions of SB 50, schools can collect fees to offset costs associated with increasing school capacity as a result of development. The development associated with the Plan would be subject to applicable fees determined by the local school districts per California Government Code Section 65995. The local school districts determine fees in accordance with California Government Code Section 65995, which can be adjusted every two years. The California Government Code establishes three types of school fees for developers, which are commonly referred to as the Level 1, Level 2 and Level 3 Fees.

**Level 1 Fee.** The Level 1 Fee is assessed if the school district can establish a reasonable relationship between the new development and the assessment of fees required to pay for facilities needed to accommodate future students (Section 66001).

**Level 2 Fee.** If state funding is available, the Level 2 Fee is assessed if a school district (i) makes a timely application to the State Allocation Board ("SAB") for new construction funding, (ii) conducts a School Facility Needs Analysis, and (iii) satisfies at least two of the four requirements set forth in Section 65995.5(b)(3) (e.g., district has “substantial enrollment” or has reached maximum bonding capacity) (Section 65595.5).

**Level 3 Fee.** If state funding is no longer available, the Level 3 Fee can be assessed, thereby allowing a school district to impose a developer fee up to 100 percent of the School Facility Program new construction project costs (Section 65995.7).

**Leroy F. Greene School Facilities Act of 1998**

The Leroy F. Greene School Facilities Act of 1998 (Chapter 12.5 of the Education Code), was signed into law on August 27, 1998. It placed a $9.2 billion state bond measure (Proposition 1A), which included grants for modernization of existing schools and construction of new schools, on ballot at the November 3, 1998, election. Under SB 50, a program for funding school facilities largely based on matching funds was created. Its construction grant provides funding on a 50/50 state and local match basis, while its modernization grant provides funding on a 60/40 basis. Districts that are unable to provide some, or all, of the local match requirement and area able to meet the financial hardship provisions may be eligible for additional state funding. In addition, SB 50 allows governing boards of school districts to establish fees to offset costs associated with school facilities made necessary by new construction. Pursuant to Government Code Section 65995, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities from implementation of a project to less than significant levels.

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California Fire Code

Title 24, Part 9 of the California Code of Regulations (CCR) is the California Fire Code. Title 24, Part 9 of the CCR sets forth regulations regarding building standards, fire protection and notification systems, fire protection devices such as fire extinguishers and smoke alarms, high-rise building standards, and fire suppression training. The 2007 California Fire Code is the incorporation of the 2006 International Fire Code of the International Code Council with necessary California amendments. Development under the Plan would be subject to applicable regulations of the California Fire Code.

Local

County and City General Plan Safety Element and Public Services and Facilities Element

In addition to federal and state regulations, cities and counties in the SCAG region may also provide regulatory protection and advisement regarding public services. California law requires that a general plan include seven elements (land use, open space, conservation, housing, circulation, noise, and safety). Many jurisdictions incorporate policies related to public services into the Safety Element. Other jurisdictions choose to prepare a separate (optional) element dealing with public services and facilities issues.

California Code of Regulation Section 65302(g) specifically provides that a city may adopt the county’s safety element if the county’s element “is sufficiently detailed containing appropriate policies and programs for adoption by a city.” The safety element must include methods to reduce the potential risk of fires, floods, earthquakes, landslides, and other hazards. Other locally relevant safety issues, such as emergency response, hazardous materials spills, and crime reduction, may also be included. Some local jurisdictions have also incorporated their hazardous waste management plans into their safety elements. In addition, the safety element may be used to establish programs and policies that promote neighborhood, institutional, governmental, and business safety. The safety element must identify and map urban fringe and rural-residential areas that are prone to wildfires, adequate evacuation routes and peak load water supplies to reduce fire hazards. The policies of the safety element form the basis of adopted fire safe ordinances and strategic fire defense system zoning. Several jurisdictions have also adopted a Public Services and Facilities Element that establishes goals, objectives, policies and standards for public services and utilities, including emergency response standards.

The safety elements and public services and facilities elements of the county general plans within the six-county SCAG region establish the following fire protection service and police protection service standards at a County level:

Imperial County

Fire Response Standards: The Imperial County General Plan does not establish fire response standards for unincorporated areas. Incorporated cities within Imperial County have established fire response

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standards. For instance, the City of El Centro’s standard fire response time is approximately 7 to 10 minutes for emergencies and 10 to 15 minutes for non-emergencies.\textsuperscript{18}

**Police Response Standards:** The Imperial County General Plan does not establish police response standards for unincorporated areas.\textsuperscript{19} Incorporated cities within Imperial County have established police response standards. For instance, the El Centro Police Department’s goal is to have 1.75 police officers per 1,000 population.\textsuperscript{20}

**Los Angeles County**

**Fire Response Standards:** According to the Safety Element of the Santa Clarita Valley Area Plan, the Los Angeles County Fire Department (LACFD) has adopted a goal of responding to calls in urban areas within five minutes, in suburban areas within eight minutes, and in rural areas within 12 minutes (Policy S-3.3.1).\textsuperscript{21} Incorporated cities within Los Angeles County have also established fire response standards.

**Police Response Standards:** To effectively and efficiently fulfill all of its functions, the Fire Department requires a staff level of one deputy sheriff per each 1,000 population.\textsuperscript{22} According to the Safety Element of the Santa Clarita Valley Area Plan, the County Sheriff’s Department strives to maintain one officer per 1,000 people. Incorporated cities within Los Angeles County have also established police response standards.

**Orange County**

**Fire Response Standards:** In accordance with the Insurance Services Office (ISO) suggested standards, ultimate fire protection rating shall be maintained by General Plan land use categories as follows: (1) ISO 3 for all urban developments including Residential (1C and 1B), Commercial (2A and 2B), Employment (3.0) and Public Facilities (4.0) which are within 5 miles from a fire station and less than 1,000 feet from a hydrant; and (2) ISO 4 for Rural Residential (1A) which are within 5 miles from a fire station and less than 100 feet from a hydrant. For areas greater than 5 miles or 1,000 feet, the ISO suggested standard is 9. Fire/paramedic facilities shall be sited in locations so as to assure efficient fire rescue and paramedic response for the service area. General criteria for site selection shall include:\textsuperscript{23}

(a) Call response time: for 80 percent of the service area, first fire engine to reach the emergency scene within 5 minutes and paramedic to reach the scene within 8 minutes.


(b) Land use compatibility: stations shall be located in commercial or industrial, or open space zones in order to avoid disturbance to residential areas wherever possible.

(c) Street access: stations shall be located adjacent to arterial highways with controlled traffic signalization

Incorporated cities within Orange County have also established fire response standards.

**Police Response Standards:** The adequacy of Sheriff service for land use proposals is determined through the Environmental Impact Report (EIR), Fiscal Impact Report (FIR), and Annual Monitoring Report (AMR) review processes. Incorporated cities within Orange County have also established police response standards.

**Riverside County**

**Fire Response Standards:** According to the Riverside County Fire Department Strategic Plan 2009-2029, the Riverside County Fire Department considers National Fire Protection Association (NFPA) Standard 1710 as a guideline for fire station location methodology, which calls for an engine company within 4:00 minutes of travel time to fire incidents and EMS calls, and a full first-alarm group within 8:00 minutes, all for a minimum of 90 percent of annual incidents. Incorporated cities within Riverside County have also established fire response standards. For instance, in the City of Corona, the targeted level of service is a 5-minute or less response time (General Plan Policy 9.2.1).

**Police Response Standards:** The Riverside County Sheriff’s Department has established a goal of maintaining 1.5 sworn officers per 1,000 population, as recommended by the ICMA (Riverside County Integrated Project (RCIP)). According to EIR No. 441 for the 2003 RCIP General Plan, the Riverside County Sheriff’s Department has established the following criteria for its staffing requirements in unincorporated areas of Riverside County:

- One sworn officer per 1,000 population (Mitigation Measure 4.15.C for EIR No. 441 specifies the use of a 1.5-officer per 1,000 population standard for new development mitigation purposes)

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• One supervisor and one support staff employee per seven officers
• One patrol vehicle per three sworn officers
• One school resource officer per school

Incorporated cities within Riverside County have also established police response standards. For instance, the City of Riverside endeavors to provide minimum response times of seven minutes on all Priority 1 calls and 12 minutes on all Priority 2 calls (Policy PS-7.5).³⁰

San Bernardino County

Fire Response Standards: The San Bernardino County General Plan does not establish fire response standards for unincorporated areas.³¹ Incorporated cities within San Bernardino County have established fire response standards. For instance, the City of Victorville has established a goal to have the first on scene unit arrive within five minutes.³²

Police Response Standards: The San Bernardino County General Plan does not establish police response standards for unincorporated areas.³³ Incorporated cities within San Bernardino County have established police response standards.

Ventura County

Fire Response Standards: The Ventura County Fire Protection District’s goal is to maintain an average emergency response time under five minutes in urban areas and under seven minutes in rural areas.³⁴ Incorporated cities within Ventura County have also established fire response standards. For instance, the City of Fillmore has established a desired ratio of 1.5 firefighters per 1,000 population.³⁵

Police Response Standards: The Ventura County General Plan does not establish police response standards for unincorporated areas.³⁶ Incorporated cities within Ventura County have established police response standards.

response standards. For instance, the City of Fillmore has established a desired level of one patrol officer per 1,000 population.37

Local planning policies related to education services are established in each jurisdiction’s general plan, usually in a Public Services Element. In general, jurisdictions have policies in place that state that public services must be provided at the same time (or in advance of) need for that service. In addition to these general policies, jurisdictions may have more specific policies tailored to performance objectives, as well as development fees.

### 3.15.2 EXISTING CONDITIONS

**Fire Protection Services**

Fire protection within the SCAG region includes a variety of federal, state, county, city, and other local fire protection agencies. Primary fire protection services occur at the community level, with city and county fire departments and fire protection districts providing this service. Also serving are a variety of volunteer fire companies. In addition, fire protection agencies provide fire protection services within state and federal lands. These agencies include, but are not limited to, federal fire agencies (Bureau of Land Management, National Park Service, National Forest Service, Department of Defense, etc.), state forestry department (CAL FIRE), tribal fire departments, airport and harbor fire departments, and in some instances business-sponsored fire departments (i.e., refineries, etc.).

Each agency provides fire services within its own area of responsibilities, but each can call upon other agencies for fire support through mutual aid agreements. Generally, fire departments take proactive and preventative measures to provide fire suppression and emergency response services for all private, institutional, and public facilities within their area of responsibility. There are over 100 county, city, or other independent fire entities that provide emergency response services in the SCAG region (Table 3.15.2-1, Fire Protection Service Providers for Jurisdictions within SCAG Counties). County service is for both unincorporated areas, cities that contract with the county for fire protection service and independent fire protection districts.

Within the SCAG region, fire response standards range from a 5-minute or less emergency response time in urban areas to a 12-minute response time in rural Los Angeles County.38,39

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### TABLE 3.15.2-1
FIRE PROTECTION SERVICE PROVIDERS FOR JURISDICTIONS WITHIN SCAG COUNTIES

<table>
<thead>
<tr>
<th>County</th>
<th>County Fire Department</th>
<th>City Fire Department</th>
<th>Fire Protection Districts or Other Independent Fire Agencies</th>
</tr>
</thead>
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<td>15*</td>
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<td>7</td>
<td>4</td>
<td>—</td>
</tr>
</tbody>
</table>

**NOTE:**
*2012 data.
Numbers do not include various federal, State, and specialty fire departments, such as Bureau of Land Management, National Park Service, Department of Defense, California Forestry Department (wild lands), private or public airport fire departments, business fire departments (i.e., refineries, Indian Tribal lands, etc.) that might aid county, city, and independent fire departments through mutual aid agreements, and vice versa. Includes cities and unincorporated county areas served by county fire departments/authority. Some districts service city and adjoining unincorporated areas. Five cities (Apple Valley, Barstow, Chino, Chino Hills, 29 Palms) served by independent fire protection districts. City of La Habra served by Los Angeles County Fire Department.

**SOURCE:**

In 2014, CAL FIRE employed 2,400 seasonal firefighters, 2,750 local government volunteer firefighters, and 4,300 inmates and wards that provided 196 fire crews to fight fires throughout the state.\(^{40}\) Within the SCAG region, county fire departments staffed over 6,000 firefighters in 2014,\(^{41}\) including 2,861


\(^{41}\) Note: annual data not available for Imperial County Fire Department, which requires at least 62 firefighters on-staff – Source: Imperial County Fire Department & Office of Emergency Services. Accessed 17 September 2015. Imperial County Fire Department Organizational Chart. Available at: http://www.co.imperial.ca.us/fire/icfd_webpage_8-4-15_003.htm
firefighters trained in infectious disease response in the Los Angeles County Fire Department,\(^\text{42}\) 1,011 Orange County Fire Authority firefighters,\(^\text{43}\) 1,160 career firefighters and 250 volunteer reserve firefighters in the Riverside County Fire Department,\(^\text{44}\) 639 San Bernardino County Fire Department fire suppression personnel,\(^\text{45}\) and 383 Ventura County Fire Protection District safety personnel.\(^\text{46}\) Within the large city of Los Angeles (471-square-mile jurisdiction), a total of 1,018 uniformed firefighters (including 270 serving as firefighters/paramedics), are always on duty at fire department facilities citywide.\(^\text{47}\) In comparison, the City of Riverside Fire Department employs 211 full-time firefighters over a primary response area of over 81 square miles.\(^\text{48}\)

**Police Protection Services**

Law enforcement within the SCAG region takes into account a variety of federal, state, county, city, and other local law enforcement agencies (Table 3.15.2-2, [Police Service Providers for Jurisdictions within SCAG Counties](#)). As with fire protection services, primary law enforcement is at the community level, with city police and sheriff’s departments providing this service. Additionally, there are more specialized law enforcement agencies that assist in law enforcement at the community or resource level in the SCAG region. These specialized agencies include, but are not limited to, CHP, school police, airport and harbor police, transit police, tribal police, park rangers (federal, state, county, and city), and a wide variety of federal agencies (FBI, ATF, etc.). Each agency has its own responsibilities, some of which may overlap with other law enforcement agencies. State park rangers may call upon sheriff’s deputies for assistance. Transit police might call upon city police to aid them. In general, law enforcement agencies provide first response to all emergencies, perform preliminary investigations, and provide basic patrol services in their service area. County service is for both unincorporated areas and cities that contract with the county for law enforcement services.

Within the SCAG region, police response standards range from 1 sworn officer per 1,000 population to 1.75 sworn officers per 1,000 population.\(^\text{49,50}\)
### TABLE 3.15.2-2
POLICE SERVICE PROVIDERS FOR JURISDICTIONS WITHIN SCAG COUNTIES

<table>
<thead>
<tr>
<th>County</th>
<th>County Sheriff’s Department</th>
<th>City Police Department</th>
</tr>
</thead>
<tbody>
<tr>
<td>Imperial</td>
<td>1</td>
<td>7</td>
</tr>
<tr>
<td>Los Angeles</td>
<td>43</td>
<td>46</td>
</tr>
<tr>
<td>Orange</td>
<td>14</td>
<td>21</td>
</tr>
<tr>
<td>Riverside</td>
<td>18</td>
<td>11</td>
</tr>
<tr>
<td>San Bernardino</td>
<td>14</td>
<td>10</td>
</tr>
<tr>
<td>Ventura</td>
<td>6</td>
<td>5</td>
</tr>
</tbody>
</table>

**NOTE:**
Includes cities and unincorporated county areas served by county sheriff’s departments. Includes cities that contract with other cities for police services (i.e., Santa Fe Springs with Whittier, etc.). Does not include specialty police agencies such as school districts, airports, ports, etc.

**SOURCE:**
San Bernardino County. Accessed 10 July 2015. Website. Available at:

### Schools

Although the California public school system is subject to state requirements, the California Department of Education relies on local control for the management of school districts. In allocating resources among the schools of the district, school district governing boards and district administrators must follow the law, but also set the educational priorities for their schools. As of the 2014–2015 school year, there were more than 1,000 school districts in California.

According to the California Department of Education, there are approximately 3.1 million students enrolled in schools in the SCAG region, ranging from kindergarten to 12th grade, with approximately 138,000 teachers (Table 3.15.2-3, Kindergarten through Grade 12 Enrollment and Teachers in the SCAG Region for the 2014–2015 School Year). The number of K–12 school districts range from a low of 17 in Imperial County to a high of 89 in Los Angeles County, with a corresponding range of school from a low of 67 in Imperial County to over 2,000 in Los Angeles County (Table 3.15.2-4, Public and Private Schools in the SCAG Region). Three counties have University of California campuses, and all but one county have one or more California State University campuses (Table 3.15.2-4).

---

### TABLE 3.15.2-3
KINDERGARTEN THROUGH GRADE 12 ENROLLMENT AND TEACHERS IN THE SCAG REGION FOR THE 2014–2015 SCHOOL YEAR

<table>
<thead>
<tr>
<th>County</th>
<th>Enrollment K–12</th>
<th>Teachers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Imperial</td>
<td>37,192</td>
<td>1,686</td>
</tr>
<tr>
<td>Los Angeles</td>
<td>1,539,260</td>
<td>72,393</td>
</tr>
<tr>
<td>Orange</td>
<td>497,116</td>
<td>20,926</td>
</tr>
<tr>
<td>Riverside</td>
<td>425,883</td>
<td>18,245</td>
</tr>
<tr>
<td>San Bernardino</td>
<td>410,696</td>
<td>18,411</td>
</tr>
<tr>
<td>Ventura</td>
<td>141,899</td>
<td>6,562</td>
</tr>
<tr>
<td>SCAG Region</td>
<td>3,052,046</td>
<td>138,223</td>
</tr>
<tr>
<td>California</td>
<td>6,235,520</td>
<td>295,025</td>
</tr>
</tbody>
</table>

**SOURCE:**

### TABLE 3.15.2-4
PUBLIC AND PRIVATE SCHOOLS IN THE SCAG REGION

<table>
<thead>
<tr>
<th>County</th>
<th>Public Schools</th>
<th>Private Schools (Active)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>K–12</td>
<td>UC System^5</td>
</tr>
<tr>
<td></td>
<td>Districts</td>
<td>Communities^3,4</td>
</tr>
<tr>
<td></td>
<td>Schools</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Imperial</td>
<td>17</td>
</tr>
<tr>
<td></td>
<td>Los Angeles</td>
<td>89</td>
</tr>
<tr>
<td></td>
<td>Orange</td>
<td>29</td>
</tr>
<tr>
<td></td>
<td>Riverside</td>
<td>25</td>
</tr>
<tr>
<td></td>
<td>San Bernardino</td>
<td>34</td>
</tr>
<tr>
<td></td>
<td>Ventura</td>
<td>22</td>
</tr>
<tr>
<td></td>
<td>Total</td>
<td>216</td>
</tr>
</tbody>
</table>

**SOURCE:**
Other Public Service Agencies Engaged in Emergency Preparedness and Security

Federal

FEMA

The six counties of the SCAG region are within FEMA Region IX, which covers the American Samoa territory; the states of Arizona, California, Hawaii, and Nevada; Guam; the Commonwealth of the Marianas Islands; the Federated States of Micronesia; and the Republic of the Marshall Islands. FEMA has 10 regional offices, each headed by a regional administrator. The regional office for Region IX is in Oakland, California. In Southern California, FEMA Region IX specifically plans for hazards such as major earthquakes and wildfires. Each of FEMA’s regional offices maintains a Regional Response Coordination Center (RRCC). When activated, RRCCs are multiagency coordination centers generally staffed by ESFs in anticipation of or immediately following an incident. Operating under the direction of the FEMA regional administrator, the staff within the RRCCs coordinates federal regional response efforts and maintains connectivity with FEMA headquarters and with state EOCs, state and major urban area fusion centers, federal executive boards, and other federal and state operations and coordination centers that potentially contribute to the development of situational awareness. The Unified Coordination Group (UCG) assumes responsibility for coordinating federal response activities at the incident level once unified coordination is established, freeing the RRCC to deal with new incidents should they occur.\(^{52}\)

TSA

TSA responsibilities in the SCAG region are focused on protection of people and commerce, including deployment at the 57 airports in the SCAG region.

NIMS

The SCAG region is under the jurisdiction of Region IX: Oakland.\(^ {53}\) The State of California adopted NIMS in 2005 by Executive Order S-2-05, and all the Counties and most of the tribes and cities in the SCAG region are involved in NIMS through the Offices of Emergency Services/Offices of Emergency Management.\(^ {54}\)

United States Coast Guard

The Eleventh Coast Guard District encompasses the states of California, Arizona, Nevada, and Utah, the coastal offshore waters, and the offshore waters of Mexico and Central America down to South America.\(^ {55}\) The Eleventh District now includes 48 units and employs 2,600 active duty, reserve, and


civilian employees. These resources carry out Search and Rescue, Homeland Security, Law Enforcement, Marine Safety, and Aids to Navigation missions over 3.3 million square miles of water. The Coast Guard has assumed a dynamic role in protecting the District’s major ports, which include two Tier One ports in the SCAG region: Los Angeles and Long Beach.

State

California Department of Transportation (Caltrans)

The SCAG region is located within the jurisdiction of Caltrans Districts 7 (Los Angeles and Ventura counties), 8 (Riverside and San Bernardino counties), 11 (Imperial County), and 12 (Orange County). Caltrans, in conjunction with the California Highway Patrol (CHP), has TMCs to rapidly detect and respond to incidents while managing the resulting congestion. With the help of intelligent transportation system technologies, such as electronic sensors in the pavement, freeway call boxes, video cameras, ramp meter sensors, earthquake monitors, motorist cellular calls, and commercial traffic reports; as well as Caltrans highway crews, 911 calls and officers on patrol, the TMC provides coordinated transportation management for general commutes, special events and incidents affecting traffic. The TMCs are operated within each Caltrans district. For the SCAG region, Districts 7, 8, 11, and 12 all have TMCs.

Local

County Offices of Emergency Services

Counties and cities are generally the first responders to any security or emergency situation. These responders include fire departments, police and sheriff department, hospitals, ambulance services and transportation agencies. Coordination among public and private agencies within various cities and counties make the most use of all available resources in the event of any emergency.

While each city and county has its own security procedures, the policies are generally similar. Mutual Aid agreements between cities, counties, and private organizations help to maximize resources and reduce the human suffering associated with disaster situations. Each SCAG county has a department in charge of security and emergency response (Table 3.15.2-5, County Offices of Emergency Services).
### TABLE 3.15.2-5
COUNTY OFFICES OF EMERGENCY SERVICES

<table>
<thead>
<tr>
<th>County</th>
<th>Office Information</th>
<th>County</th>
<th>Office Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Imperial</td>
<td>Office of Emergency Services</td>
<td>Riverside</td>
<td>Office of Emergency Services</td>
</tr>
<tr>
<td></td>
<td>1078 Dogwood Road, Heber, CA 92249</td>
<td>(951) 955-4700</td>
<td>(951) 955-4700</td>
</tr>
<tr>
<td></td>
<td>(760) 482-2400 <a href="mailto:rosahernandez@co.imperial.ca.us">rosahernandez@co.imperial.ca.us</a></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Los Angeles</td>
<td>Office of Emergency Management Phone: (323) 980-2260 Fax: (323) 881-6897</td>
<td>San Bernardino</td>
<td>Office of Emergency Services</td>
</tr>
<tr>
<td></td>
<td>1743 Miro Way, Rialto, CA 92376 Phone: (909) 356-3998 Fax: (909) 356-3965</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Orange</td>
<td>Emergency Operations Center</td>
<td>Ventura</td>
<td>Ventura County Sheriff’s Office of</td>
</tr>
<tr>
<td></td>
<td>2644 Santiago Canyon Road, Silverado, CA 92676 Phone: (714) 628-7054 <a href="mailto:OAAdmin@ocsd.org">OAAdmin@ocsd.org</a></td>
<td></td>
<td>Emergency Services</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>800 South Victoria Ave. #L3450 Ventura, CA 93009 Phone: (805) 654-2551</td>
</tr>
</tbody>
</table>

**SOURCE:**
1 Imperial County. Accessed 23 October 2015. Imperial County Fire Department & Office of Emergency Services Est. 1963. Available at: http://www.co.imperial.ca.us/fire/01-05-15_007.htm
3 Orange County Sheriff’s Department, CA. Accessed 23 October 2015. Available at: http://ocsd.org/divisions/fieldops/emb/contact
4 Riverside County Fire Department. Accessed 23 October 2015. Contact Us. Available at: http://www.rvcfire.org/Pages/ContactUs.aspx

### 3.15.3 THRESHOLDS OF SIGNIFICANCE

The potential for the 2016 RTP/SCS to result in impacts related to public services was analyzed in relation to the question contained in Appendix G of the State CEQA Guidelines. The Plan would normally be considered to have a significant impact related to public services if it would:

- Cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:
  - Fire protection and emergency response
  - Public protective security
  - Schools
  - Parks (see Section 3.16, Recreation)
Methodology

The 2016 RTP/SCS includes coordinated regional strategies for transportation investments and land use and related development that are aimed to increase mobility, promote sustainability, and improve the regional economy, consistent with project population growth. The Regional Travel Demand Model (RTDM) used for this analysis captures pass-through traffic that does not have an origin or destination in the region, but does impact the region, so that too is included in the project analysis. Although development is anticipated to occur within the region even without the 2016 RTP/SCS, this Plan includes regional land use growth policies and strategies that would likely influence growth distribution patterns throughout the region. To address this, the analysis in the PEIR covers overall impacts of transportation projects and land development strategies described in the 2016 RTP/SCS. In addition, this PEIR considers cumulative impacts from other local projects (e.g., development projects that have been approved, or included in the policy growth forecast provided by member agencies in the SCAG region, which could result in additional impacts inside and outside the region. The methodology for determining the significance of public services impacts compares the existing conditions to future (2040) conditions, as required in CEQA Section 15126.2(a). This analysis evaluates the potential for significant impacts of the 2016 RTP/SCS to public services in accordance with Appendix G of the State CEQA Guidelines and guidelines established by federal and state public agencies; Ventura, Los Angeles, Orange, San Bernardino, Riverside, and Imperial Counties; and major cities within the SCAG region.

The analysis evaluates fire protection facilities, police facilities, educational facilities, and other public facilities that could be affected by the implementation of the projects, programs, and policies identified in the 2016 RTP/SCS. To assess potential impacts to public services within the SCAG region, a geographic information system (GIS) was used to analyze major highway, transit, and freight rail projects in the 2016 RTP/SCS. Land use patterns in the SCAG region were compared with the location of transportation projects included in the Plan and anticipated development resulted from land use strategies of the Plan to determine the degree of potential impact on population growth in existing urban, suburban, and other areas in the region. The results of the GIS analysis determined whether the Plan could directly affect service ratios, response times, or other performance objectives for public services in the SCAG region, requiring new or physically altered governmental facilities. Indirect impacts were evaluated based on the land use pattern assumptions that protected lands would remain protected and new growth would be focused in urbanized areas in high-quality transit areas (HQTAs) (near transit services), underdeveloped opportunity urban areas, suburban town centers.

Impacts to police, fire and emergency services were evaluated with SCAG policy growth forecast data related to projected population, housing, and employment growth and available data on existing public services within the SCAG region. Impacts to public service facilities were evaluated with SCAG data related to projected population growth and available data on public services within the SCAG region. The methodology for determining the significance of these impacts applies the significance criteria above to the expected future (2040) demand for public service facilities and compares future demand with the Plan to the existing capacity.

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3.15.4 IMPACT ANALYSIS

IMPACT PS-1: Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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 and emergency response services.

Significant Impact

Implementation of the transportation projects and land use strategies reflected in the 2016 RTP/SCS would result in the potential to cause substantial physical impacts associated with the provision of new or physically altered fire stations that would be required to maintain acceptable service ratios and response time for fire protective services, constituting a significant impact. There are several types of transportation projects included within the 2016 RTP/SCS that, upon completion, would require different levels of fire protection and emergency response services. For instance, the improvements to, and increased use of, non-motorized transportation methods such as bicycle routes and associated facilities, are anticipated to require minimal amounts of additional fire protection and emergency response services for safety. In contrast, additional fire personnel would be needed to adequately respond to emergencies and routine calls, particularly on new or expanded transportation facilities. New light rail transit (LRT) and commuter rail routes/extensions in Los Angeles, Orange, Riverside, and San Bernardino counties, as well as other transit-related projects, would involve the construction of transit stations. These transit stations, upon completion, would require fire protection and emergency response services. Increased use of transit would involve an increased need for fire protection and emergency response services for protection and rescue services.

The 2016 RTP/SCS also includes land use strategies that might influence development patterns in the region for the next 25 years. The Plan’s land use strategies focus new growth in HQTAs, existing suburban town centers and walkable, mixed-use communities. According to the Plan, focusing new growth in HQTAs is an important aspect of the proposed land use strategies. As described in Section 2.0, Project Description, the region is expected to add approximately 3.8 million new people, approximately 1.5 million new households, and approximately 2.4 million new jobs during the next 25 years. “While HQTAs account for only 3 percent of total land area in SCAG region, they are planned and project to accommodate [approximately] 46 percent of the region’s future household growth, and 50 percent of the future employment growth.” Moreover, the transportation projects included in the Plan that involve transit, passenger rail, and active transportation are concentrated in urban and suburban areas, including Palm Springs, Riverside, San Bernardino, Anaheim, Irvine, the Los Angeles Basin, the San Gabriel Valley, the San Fernando Valley, Santa Clarita, Palmdale, and Lancaster. As these urban and suburban areas experience a potentially higher density in terms of a higher housing/job ratio and more densified, mixed-use development, additional fire protection and emergency response services would be required to meet emergency response standards. Such increased density in these

areas would have the potential to exceed the capacity of existing fire stations to provide adequate response, thus requiring either the expansion of existing station to accommodate greater number of personnel or the construction of new stations, which are more strategically located stations, capable of reducing response time within a denser urban pattern of development. In addition, fire protection and emergency response services may need to be able to expand where development occurs in the wildland urban interface in response to increased wildfire risk.

Throughout the SCAG region, emergency service providers have historically accommodated increases in demand (with increased staff and facilities funded through general funds of each jurisdiction). New or expanded transportation facilities would have a potential to increase the demand for emergency personnel and facilities potentially without increasing funding or identifying new available funding sources, resulting in a potentially significant impact related to fire protection and emergency response services. Densified development in some areas of the region would potentially increase demand for fire protection and emergency response services. Frequently tax revenues associated with development pays for increased services, however, tax revenue is not always sufficient.

The 2016 RTP/SCS would potentially contribute to substantial adverse physical impacts associated with the provision of new or physically altered fire protection and emergency response facilities in order to maintain acceptable service ratios, requiring the consideration of mitigation measures.

**IMPACT PS-2: Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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 public protective security services.**

**Significant Impact**

Implementation of the transportation projects and land use strategies reflected in in the 2016 RTP/SCS would have a potential to cause substantial physical impacts associated with the provision of new or physically altered public protective security services (including sheriff, police, CHP, and OES) that would be required to maintain acceptable service ratios and response time for public protective security services, constituting a significant impact. DHS and TSA staff are generally deployed at transportation facilities; therefore, the 2016 RTP/SCS would not be expected to require new or expanded facilities beyond those developed as elements of the transportation projects.

However, there are several types of projects like new or expanded transportation projects included in the 2016 RTP/SCS that, upon completion, would require different levels of public protective security services. Additional police personnel would be needed to adequately respond to emergencies and routine calls, particularly on new or expanded transportation facilities. New LRT and commuter rail routes/extensions in Los Angeles, Orange, Riverside, and San Bernardino counties, as well as other transit-related projects, would involve the construction of new transit stations. These new transit stations, upon completion, would require public protective security services. In some cases, such as with Metro, the governing transit authority provides security as an element of the project, which would result in a less than significant impact to public protective security services. Moreover, one of the goals
of the 2016 RTP/SCS is to maximize mobility and accessibility for all people and goods in the region, and to accomplish that, the Plan includes transportation investments (e.g., “64 percent of total operations and maintenance” and “20 percent of capital investments” on transit), and land use strategies to encourage more people to use transit services. These strategies would likely add new transit facilities and increase the use of existing and new transit, thereby resulting in an increased need for public protective security services for protection and rescue services. However, the improvements to, and increased use of, non-motorized transportation methods such as bicycle routes and associated transportation facilities, are anticipated to require minimal amounts of additional police and emergency services for security and safety.

The 2016 RTP/SCS also includes land use strategies that focus new growth in HQTAs, existing suburban town centers and encourage more walkable, mixed-use communities. According to the Plan, it is projected that approximately 46 percent of the new household growth and 50 percent of the new employment growth would be planned in HQTAs. These HQTAs are concentrated in suburban and urban areas, including Palm Springs, Riverside, San Bernardino, Anaheim, Irvine, the Los Angeles Basin, the San Gabriel Valley, the San Fernando Valley, Santa Clarita, Palmdale, and Lancaster. As these suburban and urban areas experience more people working and living there, additional police services would be required. As a result, anticipated development patterns that are influenced by the land use strategies of the 2016 RTP/SCS would have a potential to result in additional needs for public protective security services, usually in direct proportion to densified environment.

The population in the SCAG region is anticipated to increase by approximately 3.8 million people over the next 25 years, with or without the Plan. Based on the police response standards within the SCAG region that range from 1 sworn officer per 1,000 population to 1.75 sworn officers per 1,000 population, the projected growth for 2040, and an assumption of current adequate staffing, the number of sworn officers needed within the SCAG region to maintain acceptable service ratios is anticipated to increase by approximately 3,500, ranging from approximately 58 new sworn officers in Imperial County to approximately 1,472 new sworn officers in Los Angeles County. The transportation projects and land use strategies in the 2016 RTP/SCS focus development in urbanized portions of the region, specifically in HQTAs and other existing infrastructure such as transit. As more people are interested in and choosing to live and work in HQTAs where there will be more compact, walkable, and bikeable communities, it is likely that a densified development would increase the demand for sworn officers. This would likely increase the staffing of sworn officers and create a potential need to construct new stations that would have the potential to result in physical alterations and related significant effects on the environment.

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60 Southern California Association of Governments. Accessed 11 September 2015. Profiles of Imperial County, Los Angeles County, Orange County, Riverside County, San Bernardino County, and Ventura County. Available at: http://www.scag.ca.gov/DataAndTools/Pages/LocalProfiles.aspx
61 SCAG locally reviewed policy forecast model (as of October 5, 2015).
62 Southern California Association of Governments. Accessed 11 September 2015. Profiles of Imperial County, Los Angeles County, Orange County, Riverside County, San Bernardino County, and Ventura County. Available at: http://www.scag.ca.gov/DataAndTools/Pages/LocalProfiles.aspx
Throughout the SCAG region, emergency service providers have historically accommodated increases in demand (with increased staff and facilities funded through general funds of each jurisdiction). As analyzed above, new or expanded transportation facilities included in the 2016 RTP/SCS may increase the demand for emergency personnel and facilities potentially without increasing funding, resulting in a significant impact related to police protection services. Anticipated development patterns that would be influenced by land use strategies included in the 2016 RTP/SCS would also likely increase demand for public protective security services. Though tax revenues associated with development pay for increased services, tax revenue is not always sufficient.

Therefore, the 2016 RTP/SCS would potentially contribute to substantial adverse physical impacts associated with the provision of new or physically altered public protective security facilities in order to maintain acceptable service ratios, requiring the consideration of mitigation measures.

**IMPACT PS-3: Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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.**

**Significant Impact**

Implementation of the transportation projects and land use strategies with the related development patterns reflected in the 2016 RTP/SCS would result in potential to cause substantial physical impacts associated with the provision of new or physically altered schools that would be required to maintain acceptable service ratios and response time for school services, constituting a significant effect. Population in the SCAG region is anticipated to increase by approximately 3.8 million people over the next 25 years, with or without the Plan.\(^63\)\(^64\) Based on the 2014–2015 enrollment of approximately 3.1 million students in the SCAG region (approximately 16.4 percent of an overall 2014 population of 18.5 million), and considering the projected growth scenario for 2040, the number of children enrolled in K–12 schools is anticipated to increase by approximately 589,000 students.\(^65\) The land use strategies included in the 2016 RTP/SCS direct new growth to existing urbanized communities within the SCAG region. For example, as projected by the 2016 RTP/SCS, HQTAs are planned to accommodate 46 percent of the region’s future household growth. It is anticipated that this increase in population and households in already existing communities and HQTAs would require construction or expansion of new schools in the region to accommodate the increased growth as well as densified development (e.g., more families living and/or working there). Therefore, the 2016 RTP/SCS would potentially contribute to substantial adverse physical impacts associated with the provision of new or physically altered school

\(^{63}\) Southern California Association of Governments. Accessed 11 September 2015. Profiles of Imperial County, Los Angeles County, Orange County, Riverside County, San Bernardino County, and Ventura County. Available at: http://www.scag.ca.gov/DataAndTools/Pages/LocalProfiles.aspx

\(^{64}\) SCAG locally reviewed policy forecast model (as of October 5, 2015)

\(^{65}\) Southern California Association of Governments. Accessed 11 September 2015. Profiles of Imperial County, Los Angeles County, Orange County, Riverside County, San Bernardino County, and Ventura County. Available at: http://www.scag.ca.gov/DataAndTools/Pages/LocalProfiles.aspx
facilities in order to maintain acceptable service ratios, requiring the consideration of mitigation measures.

**IMPACT PS-4:** Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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 park services.

Parks are evaluated in Section 3.16, *Recreation*.

### 3.15.5 CUMULATIVE IMPACTS

Related projects considered within each county in combination with the 2016 RTP/SCS include development projects and the Mesquite Lake Specific Plan in Imperial County; development (including mixed-use) projects, the town of Centennial, the Newhall Ranch Specific Plan, the Northlake Specific Plan, and the City of Los Angeles’ Mobility Plan 2035 in Los Angeles County; the Orange County Affordable Housing Implementation Program – Ranch Plan, development projects, airport and utility expansion projects, recreation projects, the Anaheim Canyon Specific Plan, and the expansion of the James A. Musick Jail in Orange County; development projects, the Riverside Community Hospital Specific Plan, the California Baptist University Specific Plan in Riverside County; the Glen Hellen Specific Plan and the Specific Plan for Hacienda at Fairview Valley in San Bernardino County; and new fire stations, utility expansion projects, and subdivision projects in Ventura County.

**IMPACT PS-1:** Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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 and emergency response.

**Significant Cumulative Impact**

The 2016 RTP/SCS would contribute to cumulative significant impacts in the region when considered with related projects in regard to fire protection and emergency response services because many areas already have insufficient fire protection and emergency response service, and implementation of the 2016 RTP/SCS would have the potential to further exacerbate existing needs and expanded needs from related projects. The related transportation projects and growth development patterns would also require the provision of new or physically altered governmental facilities to provide adequate fire response times in the vicinity of new development, resulting in a significant cumulative impact requiring the consideration of mitigation measures.
IMPACT PS-2: Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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 public protective security services.

**Significant Cumulative Impact**

The 2016 RTP/SCS would also contribute to cumulative significant impacts in the region when considered with related projects in the region in regard to public protective security services because implementation of the Plan would likely require the provision of new or physically altered governmental facilities to provide adequate public protective security service ratios in response to implementation of the transportation projects included in the Plan and growth development patterns for accommodating anticipated population growth that the region would face in the next 25 years. Many areas already have insufficient public protective security services, and implementation of the 2016 RTP/SCS would likely further exacerbate existing needs and expanded needs from related projects, resulting in a significant cumulative impact requiring the consideration of mitigation measures.

IMPACT PS-3: Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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.

**Less than Significant Cumulative Impact**

The 2016 RTP/SCS would not be expected to contribute to cumulative significant impacts in the region when considered with related projects in regard to school services because such changes would be addressed by planning efforts in jurisdictions. The state requires schools to be funded for school-age children by payment of school district fees in association with the related projects that involve population growth that can cause a potential strain on services, resulting in less than significant cumulative impact. The consideration of mitigation measures is not required.

### 3.15.6 MITIGATION MEASURES

Mitigation measures as they pertain to each CEQA question related to public services are described below. Mitigation measures are categorized into two categories: SCAG mitigation and project-level mitigation measures. SCAG mitigation measures shall be implemented by SCAG over the lifetime of the 2016 RTP/SCS. Project-level mitigation measures can and should be implemented by the Lead Agencies for transportation and development projects, as applicable and feasible.
IMPACT PS-1: Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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.

SCAG Mitigation Measures

MM-PS-1(a)(1): SCAG shall facilitate minimizing future impacts to fire protection and emergency response services through cooperation, information sharing, and regional program development as part of SCAG’s ongoing regional planning efforts, such as web-based planning tools for local government including CALOTS, and other GIS tools and data services, including, but not limited to, Map Gallery, GIS library, and GIS applications, and direct technical assistance efforts to promote Fire Management and Emergency Response Planning such as Toolbox Tuesday Training series and sharing of associated online Training materials. Lead Agencies, such as county and city planning departments, shall be consulted during this update process.

MM-PS-1(a)(2): SCAG shall utilize its strengths and organization to assist planners, first responders, and recovery teams in a supporting role, in three key areas, before a major emergency and during the recovery period:

- Provide a policy forum to help develop regional consensus and education on security policies and emergency responses.
- Assist in expediting the planning and programming of transportation infrastructure repairs from major disasters.
- Encourage integration of transportation security measures into transportation projects early in the project development process by leveraging SCAG’s relevant plans, programs, and processes, including regional ITS architecture. SCAG also participated in the development of the draft Southern California Catastrophic Earthquake Preparedness Plan.

MM-PS-1(a)(3): SCAG shall facilitate minimizing future impacts to fire protection services through information sharing regarding Fire-wise Land Management (data regarding fire-resistant vegetation, fire-resistant materials, locations where development is potentially hazardous in regard to wildfire, and management of brush and other fire risks in the immediate vicinity of development in areas with high fire threat) with county and city planning departments.

Project-Level Mitigation Measures

Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-US-3(b), MM-US-4(b), and MM-US-6(b).

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**MM-PS-1(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable response times for fire protection and emergency response services that are within the jurisdiction and responsibility of fire departments, law enforcement agencies, and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with the Community Facilities Act of 1982, the goals and policies established within the applicable adopted county and city general plans and the performance objectives established in the adopted county and city general plans, to provide sufficient structures and buildings to accommodate fire and emergency response, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking into account project and site-specific considerations as applicable and feasible:

- Where the project has the potential to generate the need for expanded emergency response services which exceed the capacity of existing facilities, provide for the construction of new facilities directly as an element of the project or through dedicated fair share contributions toward infrastructure improvements.
- During project-level review of government facilities projects, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b) to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities.

**IMPACT PS-2:** Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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 public protective security services.

**SCAG Mitigation Measures**

**MM-PS-1(a)(2).**

**MM-PS-2(a)(1):** SCAG shall facilitate minimizing future impacts to public protective security services through cooperation, information sharing, and regional program development as part of SCAG’s ongoing regional planning efforts, such as web-based planning tools for local government including CA LOTS, and other GIS tools and data services, including, but not limited to Map Gallery, GIS library, and GIS applications, and direct technical assistance efforts to promote public protective security services planning such as Toolbox Tuesday Training series and sharing of associated online training materials.
Lead Agencies, such as county and city planning departments, shall be consulted during this update process.

**MM-PS-2(a)(2):** SCAG shall help to enhance the region’s ability to deter and respond to acts of terrorism, human-caused or natural disasters through regionally cooperative and collaborative strategies. SCAG shall work with local officials to develop regional consensus on regional transportation safety, security, and safety security policies.

**MM-PS-2(a)(3):** SCAG shall help to enhance the region’s ability to deter and respond to terrorist incidents, human-caused or natural disasters by strengthening relationship and coordination with transportation. This will be accomplished by the following:

- SCAG shall work with local officials to develop regional consensus on regional transportation safety, security, and safety security policies.
- SCAG shall encourage all SCAG elected officials are educated in NIMS.
- SCAG shall work with partner agencies, federal, state and local jurisdictions to improve communications and interoperability and to find opportunities to leverage and effectively utilize transportation and public safety/security resources in support of this effort.

**MM-PS-2(a)(4):** SCAG shall encourage and provide a forum for local jurisdictions to develop mutual aid agreements for essential government services during any incident recovery.

**Project-Level Mitigation Measures**

Mitigation Measures **MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b),** and **MM-USS-6(b).**

**MM-PS-2(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable service ratios for police protection services that are within the jurisdiction and responsibility of law enforcement agencies and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with the Community Facilities Act of 1982, the goals and policies established within the applicable adopted county and city general plans and the standards established in the safety elements of county and city general plans to maintain police response performance objectives, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking in to account project and site-specific considerations as applicable and feasible, including:

- Coordinate with public security agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times or other performance objectives for public protective security services and that any required additional construction of buildings is incorporated in to the project description.
• Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements and/or personnel.

• During project-level review of government facilities projects, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b) to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities.

**IMPACT PS-3: Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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.**

**SCAG Mitigation Measures**

**MM-PS-3(a):** SCAG shall facilitate minimizing future impacts to school services through cooperation, information sharing, and regional program development as part of SCAG’s ongoing regional planning efforts, such as web-based planning tools for local government including CA LOTS, and other GIS tools and data services, including, but not limited to, Map Gallery, GIS library, and GIS applications, and direct technical assistance efforts to promote school planning, such as Toolbox Tuesday Training series and sharing of associated online Training materials. Lead Agencies, such as county and city planning departments, shall be consulted during this update process.

**Project-Level Mitigation Measures**

Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b).

**MM-PS-3(b):** Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the 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 that are within the jurisdiction and responsibility of school districts and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Community Facilities Act of 1982, the California Education Code, and the goals and policies established within the applicable adopted county and city general plans to ensure that the appropriate school district fees are paid in accordance with state law, as applicable and feasible. Such measures may include the following,
or other comparable measures identified by the Lead Agency, taking into account project and site-specific considerations as applicable and feasible:

- Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.
- During project-level review of government facilities projects, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b) to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities.

### 3.15.7 LEVEL OF SIGNIFICANCE AFTER MITIGATION

**IMPACT PS-1:** Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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.

Implementation of Mitigation Measures MM-PS-1(a)(1) through MM-PS-1(a)(3), MM-PS-1(b), MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b) would reduce direct, indirect, and cumulative impacts to below the level of significance.

**IMPACT PS-2:** Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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 public protective security services.

Implementation of Mitigation Measures MM-PS-1(a)(2), MM-PS-2(a)(1) through MM-PS-2(a)(4), and MM-PS-2(b) and Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b) would reduce direct, indirect, and cumulative impacts to below the level of significance.
IMPACT PS-3: Potential to cause substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the 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.

Implementation of Mitigation Measures MM-PS-3(a), MM-PS-3(b), MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MM-GEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b) and compliance with state requirements for school district fees would reduce these direct and indirect impacts to below the level of significance.