3.15 PUBLIC SERVICES

This section of the 2024 PEIR describes existing public services within the SCAG region, sets forth the regulatory framework that affect public services, and analyzes the potential impacts of Connect SoCal 2024. In addition, this 2024 PEIR provides regional-scale mitigation measures as well as project-level mitigation measures that can and should be considered and implemented by lead agencies for subsequent, site-specific reviews to reduce identified impacts as appropriate and feasible. This section addresses Public Services for fire protection, police services, schools and library services. Impacts related to parks are addressed in Section 3.16, Recreation. With respect to fire protection, additional considerations are addressed in Section 3.20, Wildfire, and emergency access and emergency response and evacuation plans are addressed in Section 3.9, Hazards and Hazardous Materials. Additional discussion of schools is provided in Sections 3.3, Air Quality, and 3.11, Land Use and Planning, of this 2024 PEIR.

3.15.1 ENVIRONMENTAL SETTING

DEFINITIONS

Definitions of terms used in the regulatory framework, characterization of baseline conditions, and impact analysis for public services follow:

- 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 makes the most use of all available resources in the event of any emergency. While each city and county have their 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.
- Federal Emergency Management Agency (FEMA): FEMA is a federal agency that has served the United States
 (U.S) 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 (FEMA 2023a). 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 manmade, including acts of terror. FEMA is part of the U.S. Department of Homeland Security.
- California Governor's Office of Emergency Services (Cal OES): Cal OES 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. This includes responding, directing, and coordinating state and federal resources and
 mutual aid assets and supporting communities across the State. Cal OES serves as the state's overall
 coordinator and agent to secure federal government resources through the FEMA (Cal OES 2023a).
- Joint Field Office (JFO): A temporary Federal facility established locally to provide a central point for federal, state, local, and tribal executives with responsibility for incident oversight, direction, and/or assistance to effectively coordinate protection, prevention, preparedness, response, and recovery actions. In the event of multiple incidents, multiple JFOs may be established at the discretion of the Secretary of Homeland Security.

- Master Mutual Aid Agreements (MAA): FEMA encourages federal, state, local, and tribal governments to enter into agreements to assist one another. Immediately following the 1994 Northridge earthquake, city and county emergency managers in the Cal OES 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 (Cal OES 2019).
- 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 (FEMA 2017).
- National Preparedness System: The National Preparedness System, also a part of FEMA, is a part of NIM. The
 system is intended to be used by individuals, families, communities, the private and nonprofit sectors, faithbased organizations, and local, state, tribal, territorial, insular area, and federal governments to achieve the
 National Preparedness Goal (FEMA 2016).
- Transportation Management Centers (TMCs): The California Department of Transportation (Caltrans), in conjunction with the California Highway Patrol (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 (Caltrans 2023).
- 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 (TSA 2023). 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 (FEMA 2023b).
- United States Coast Guard (USCG): 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. The over 50,000 members of the Coast Guard

operate a multi-mission, interoperable fleet of 259 Cutters, 200 fixed and rotary-wing aircraft, and over 1,600 boats (USCG 2023)

- 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 Cal OES (USAR 2023).
- 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 (DHS 2023). 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.

3.15.1.1 FIRE PROTECTION

Fire protection within the SCAG region includes a variety of federal, state, county, city and local fire protection agencies. The primary fire protection services occur at the community level with city and county fire departments and fire protection districts providing this service. Also serving as fire protection services are a variety of volunteer fire companies. In addition, there are fire protection agencies that provide fire protection services within state and federal lands. These agencies include but are not limited to federal fire agencies (Bureau of Land Management [BLM], National Park Service, National Forest Service, Department of Defense, etc.), state forestry department, airport, and harbor fire departments, and in some instances, business sponsored fire departments (i.e., refineries). Each agency provides fire protection services within their own area of responsibility, but they 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.

WILDFIRES

Section 3.20, *Wildfire*, discusses in more detail the wildfire hazards and existing conditions within the SCAG region, as well as identifies the regulatory framework with respect to regulations that address wildfire and evaluates the significance of impacts that could result from the proposed Plan.

The wildfire season in southern California typically lasts six to eight months from summer to fall (although climate change has resulted in drier, hotter weather and longer fire seasons). Hazards arise from a combination of hot weather, the accumulation of dried vegetation, and low moisture content in the air. These conditions, if coupled with high winds and drought, can compound the risk and potential impact of a fire. Fires are usually classified as either urban fires or wildland fires. However, growth into rural areas has increased the number of people living in heavily vegetated areas where wildlands meet urban development, also referred to as the wildland-urban interface. This trend is spawning a third classification of fires: the urban wildfire. A fire along the wildland-urban interface (as was seen recently in Ventura and Los Angeles counties with the Woolsey Fire) can result in major losses of property and structures.

Three major factors sustain wildfires and allow for predictions of a given area's potential to burn. These factors include fuel, topography, and weather. Certain areas in and surrounding the region are extremely vulnerable to fires because of dense, grassy vegetation combined with a growing number of structures being built near and within rural areas. The California Department of Forestry and Fire Protection (CAL FIRE) has developed maps indicating fire hazard severity zones in each county across California.

URBAN FIRES

Urban fires occur in developed areas and include structural, chemical, and vehicular-related fires. Structural fires can result from mechanical failures, accidental occurrences, or arson. The building materials used in various structures can limit or be a catalyst for the spread of structural fires. Although structural fires can occur in any developed area, non-sprinklered commercial buildings in downtown areas and dwelling units in lower socioeconomic areas appear to be more susceptible to fires, namely due to the age of the structures. Older structures are more susceptible to fire because they were built under older building standards and fire codes, are made from non-fire-resistive construction materials, and do not have internal sprinklers or other fire safety systems.

URBAN-WILDLAND FIRE

CAL FIRE has compiled a list of cities with Very High Fire Hazard Severity zones and has developed recommendations to local jurisdictions for proper fire management within those areas. Within the SCAG region, Los Angeles County has 38 cities with such zones, Riverside County has 22, Orange County has 20, San Bernardino County has 15 and Ventura County has eight cities that CAL FIRE has recommended establishing Very High Fire Hazard Severity zones (CAL FIRE 2022).

FIRE PROTECTION AGENCIES

Fire suppression is the responsibility of various fire departments and districts, which often also employ paramedics for emergency medical services. The SCAG region has more than 100 county, city, or independent fire entities that provide fire prevention/suppression and emergency services throughout the area. Response times vary amongst the agencies; however, urban areas usually maintain a standard of around 6 minutes or less while response times in rural areas are around 10 minutes. County service covers unincorporated areas, independent fire districts, and municipalities that contract for fire protection and emergency services.

BUREAU OF LAND MANAGEMENT

The Bureau of Land Management (BLM) is a federal agency that manages the nation's subsurface mineral resources under the U.S. Department of the Interior. The land and minerals under BLM authority include, but are not limited to, forests, mountains, and rangelands.

BLM operates the Fire and Aviation program which works with state and field offices to provide a fire and aviation management program. BLM provides coordination with state offices to provide effective interagency activities and policy through the National Interagency Fire Center (NIFC) in Boise, Idaho. BLM's fire and aviation program has three organizational levels: (1) the national office which provides leadership and oversight, and develops policy, procedures and budgets for the fire and aviation program; (2) state offices which are responsible for coordinating policies and interagency activities within their state; and (3) field offices which are responsible for on-the-ground fire management and aviation activities, often partnering with other agencies to maximize rapid initial attack (BLM 2023).

BLM plays a primary role in the nation's wildland fire management efforts and undertakes a broad range of activities to protect the public, natural landscape, wildlife habitat, and recreational areas. BLM trains firefighters in fire suppression, preparedness, predictive services, vegetative fuels management, prescribed fire, community assistance and protection, and education (BLM 2023).

NATIONAL PARK SERVICE

The National Park Service (NPS), a federal agency under the U.S. Department of the Interior, helps manage wildland fires in designated National Parks, such as Joshua Tree National Park. The NPS finds wildfires beneficial to ecosystems, but NPS fire staff are trained and equipped to aggressively put out an unwanted fire when it is necessary for resource protection or public safety (NPS 2018).

U.S. FOREST SERVICE

The National Forest Service (USFS) is a federal agency under the U.S. Department of Agriculture. Similarly, to the National Park Service, the USFS works with other agencies to manage wildland fires that threaten lives, homes, communities, and natural and cultural resources (USDA 2023). The USFS aids with fire protective services in wildland areas, including Angeles National Forest.

CALIFORNIA DEPARTMENT OF FORESTRY AND FIRE PROTECTION

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 jurisdictions to respond to emergencies including wildland and structure fires, earthquakes, floods, hazardous material spills, medical aids, and terrorist attacks (CAL FIRE 2023). CAL FIRE provides fire protection services to California's privately-owned wildlands and works in collaboration with counties and local governments to provide emergency services. CAL FIRE responds to medical aids; hazardous material spills; swiftwater rescues; search and rescue missions; civil disturbances; train wrecks; floods; earthquakes and more (CAL FIRE 2018).

U.S. OFFICE OF EMERGENCY SERVICES

The U.S. Office of Emergency Services (OES) leads the Department of the Interior's emergency management efforts. The OES develops guidelines for emergency preparedness, response, recovery, and mitigation to natural, manmade, and technological disasters. The State of California has its own OES—Cal OES—which allows for similar efforts of emergency management on a relatively smaller scale.

CAL OES has three administrative regions, Inland, Coastal, and Southern. All of the counties within the SCAG region are located within the Southern Region. Cal OES coordinates disaster response between state agencies and local governments, and offers guidance and assistance for emergency preparedness, response, and recovery. In addition, Cal OES manages Emergency Operations Centers (EOC) in various counties across the state and assists local governments in developing emergency plans (Cal OES 2023b).

SCAG COUNTY AGENCIES

IMPERIAL COUNTY

Fire protection in Imperial County is managed by the Imperial County Fire Department and OES. The County Fire Department maintains nine stations; these stations are located in the communities of Heber, Seeley, Ocotillo, Palo Verde, Niland, Winterhaven, Salton City, and the City of the Imperial (CIFDOES 2023). Additionally, it contracts fire service with the cities of Brawley, Calipatria, Holtville, Westmorland, Salton City and Salton Sea Beach. Each County station is staffed with a captain, firefighter, and reserve firefighter, and has at least a Type I engine. Average response times are between 8 and 10 minutes (CIPDS 1992). In addition, the OES provides emergency management services for the County/Operational Area including its seven cities/towns and special districts (CIFDOES 2023). Six cities in the county maintain their own fire departments (FireDepartment.org 2023).

LOS ANGELES COUNTY

The Los Angeles County Fire Department (LACFD) serves unincorporated areas of the County as well as 60 cities. In addition to emergency response, the LACFD also conducts field and business inspections, maintains prevention data systems, reviews new plans and projects, and even serves filming and special events industries. The County is divided into three regions, further split into nine divisions and 22 battalions (LACFD 2021). Response time goals for LACFD are 5 minutes or less for urban areas, 8 minutes for suburban areas, and 12 minutes for rural areas. In addition to the County Fire Department, 20 cities in the County maintain their own fire departments (CLADRP 2014).

ORANGE COUNTY

The Orange County Fire Authority (OCFA) was created in 1995, under a Joint Power Authority established among the cities of Buena Park, Cypress, Dana Point, Irvine, Laguna Hills, Laguna Niguel, Lake Forest, La Palma, Los Alamos, Mission Viejo, Placentia, San Clemente, San Juan Capistrano, Seal beach, Stanton, Tustin, Villa Park, and Yorba Linda to provide fire prevention and emergency services to them and unincorporated areas within the County. The cities of Westminster, Laguna Woods, Rancho Santa Margarita, and Aliso Viejo also contract with the OCFA. There are 78 OCFA stations across the County and 12 cities maintain their own departments (OCFA 2023; County of Orange 2023).

RIVERSIDE COUNTY

Riverside County contracts with CAL FIRE for management of the Riverside County Fire Department (RCFD). The RCFD operates 94 fire stations across six service areas including 21 cities, although more than half of the stations are located in unincorporated areas. Additionally, the CAL FIRE Riverside Unit serves portions of San Diego and Orange counties and operates 20 partner city fire departments and one community services district (CSD) fire department within Riverside County (CRFD 2023). The RCFD also assists various cities and communities under mutual and automatic aid agreements (CRPD 2015).

SAN BERNARDINO COUNTY

The San Bernardino County Fire Protection District (SBCFPD) has a service area of more than 19,000 square miles and provides fire services to all 24 incorporated cities. The Fire Department maintains 55 active stations across five divisions and provides emergency response and fire protection and prevention services. The San Bernardino County Fire Protection District also manages hazardous waste programs, performs inspections and plan reviews, and assists with safety procedures at special events. The department is comprised of more than 1,000 personnel and maintains a variety of equipment such as boats, ambulances, Snow Cats, and a helicopter (SBCFPD 2022).

VENTURA COUNTY

The Ventura County Fire Protection District (VCFPD) provides fire prevention and suppression and rescue services. The VCFPD serves Camarillo, Moorpark, Ojai, Port Hueneme, Simi Valley, and Thousand Oaks, as well as the unincorporated regions, including 860 square miles of forest reserve. The VCFPD is divided into five battalion areas and operates 33 fire stations across the County (CVFD 2021). The goal for average response time for the District is under five minutes in urban areas and under seven minutes in rural areas (CVRMAPD 2005).

3.15.1.2 POLICE PROTECTION SERVICES

Law enforcement is provided by a variety of federal, state, county, city, and other local law enforcement agencies. Primary law enforcement is at the community level, with city police and County 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. These specialized agencies include but are not limited to California Highway Patrol (CHP), School Police, Airport Police, Transit Police, Park Rangers (federal, state, county, and city), and a wide variety of federal agencies (FBI, ATF, etc.). In general, law enforcement agencies provide first response to all emergencies, perform preliminary investigations, and provide basic patrol services in their service area.

CALIFORNIA HIGHWAY PATROL

CHP is a statewide law enforcement agency with jurisdiction over all highways and city roads. CHP officers are responsible for responding to car crashes, disabled vehicles, and other impediments to traffic flow. Although its primary mission is related to transportation, the CHP has broad enforcement power over state law.

IMPERIAL COUNTY

Imperial County receives police protection from the Imperial County Sheriff's Office (ICSO), headquartered in El Centro. Substations are located in Niland, Ocotillo, Palo Verde, Salton City, and Winterhaven. The ICSO employs approximately 125 sworn officers and 95 personnel for an officer-to-resident ratio of about 1.5 sworn officers per 1,000 persons. The average response time for priority and non-priority calls is approximately 28 minutes as of September 2023 (ICSO 2023). Additionally, each city in the county maintains its own police departments to serve their incorporated areas.

LOS ANGELES COUNTY

Law enforcement in Los Angeles County is provided by the Los Angeles Sheriff's Department (LASD), which is headquartered in the City of Los Angeles. With nearly 18,000 employees, LASD is the largest sheriff's department in the U.S. LASD provides general law enforcement services to unincorporated Los Angeles County as well as contracted cities. Of the County's 88 municipalities, 42 contract with LASD for local police protection. LASD also provides services to 216 facilities, hospitals, and clinics, nine community college, the Metropolitan Transit Authority, and 37 Superior Courts. LASD desired officer-to-population ratio is one officer per 1,000 residents. The LASD's goal response time for emergency calls is 10 minutes or less (CLADRP 2015).

ORANGE COUNTY

The Orange County Sheriff-Coroner Department (OCSD) provides police services to unincorporated areas of Orange County as well as contracting cities of Aliso Viejo, Dana Point, Laguna Hills, Laguna Niguel, Laguna Woods, Lake Forest, Mission Viejo, Rancho Santa Margarita, San Clemente, San Juan Capistrano, Stanton, and Villa Park.

The OCSD headquarters are located in the City of Santa Ana. The department is split into five divisions: North, South, and West Operations Divisions, the Airport Division, and the Harbor Patrol division. The OCSD is a large, multi-faceted law enforcement agency served by approximately 3,500 sworn and professional staff members and over 800 reserve personnel (OCSD 2021). The OCSD provides first responder patrol services and hazardous devices services to all law enforcement agencies in the County.

RIVERSIDE COUNTY

The Riverside County Sheriff's Department provides community policing and operates the County's correctional facilities. The Department is headquartered in the City of Riverside and provides services to the unincorporated areas of the County as well as the cities of Calimesa, Canyon Lake, Coachella, Eastvale, Indian Wells, Jurupa Valley, Lake Elsinore, La Quinta, Menifee, Moreno Valley, Morongo Indian Reserve, Norco, Palm Desert, Perris, Rancho Mirage, San Jacinto, Temecula, Wildomar. The Department employs approximately 4,500 people, roughly 2,300 of which are sworn personnel. There are nine Sheriff Department stations throughout the County and five adult correction or detention centers. The Department has established a staffing requirement of one sworn officer per 1,000 population (CRPD 2015).

SAN BERNARDINO COUNTY

The San Bernardino County Sheriff's Department (SBCSD) polices the largest geographical county in the nation. It serves over 2.1 million residents across 15 patrol stations. SBCSD employs over 3,800 employees and utilizes over 1,800 volunteers. The SBCSD also maintains three correctional facilities: the West Valley Detention Center in Rancho Cucamonga; the Glen Helen Rehabilitation Center, a two unit, male and female-inmate facility in Devore; and the Central Rehabilitation Center that houses federal inmates for the United States Marshall Service located in the City of San Bernardino (CSBSD 2017).

VENTURA COUNTY

The Ventura County Sheriff's Office provides primary law enforcement services in unincorporated areas of Ventura County and the contract cities of Ojai, Thousand Oaks, Camarillo, Moorpark and Fillmore. This jurisdiction makes up almost 95 percent of the County's land area and approximately half of the population. The Department is divided into seven divisions, based on location, and is headquartered at 800 South Victoria Avenue in the City of Ventura. The Sheriff's Office employees approximately 1,180 personnel, including allocations for more than 726 sworn positions (CVSD 2020).

3.15.1.3 SCHOOL SERVICES

Local jurisdictions within the SCAG region provide public education facilities and services to residents including elementary schools, middle schools, secondary schools, postsecondary schools, and colleges/universities, as well as special and adult education.

CALIFORNIA DEPARTMENT OF EDUCATION

The California Department of Education (CDE) oversees the state's public school system, which provides education to more than 6 million children and young adults in more than 10,000 schools. 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 programs, secondary school programs, adult education, some preschool programs, and childcare programs.

Although the California public school system is subject to state requirements, the CDE 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 2022–2023 school year, there were more than 1,080 school districts in California (CDE 2023a).

EDUCATIONAL FACILITIES

According to the California Department of Education (CDE), there are approximately three million students enrolled in schools in the SCAG region, ranging from kindergarten to 12th grade, with over 141,000 teachers (see **Table 3.15.1-1, Kindergarten through Grade 12 Enrollment and Teachers in the SCAG Region for the 2017–2018 School Year**). The number of public K–12 school districts range from a low of 19 in Imperial County to a high of 80 in Los Angeles County, with a corresponding range of schools from a low of 74 in Imperial County to over 2,300 in Los Angeles County (see **Table 3.15.1-2, Public and Private Schools in the SCAG Region**). The CDE does not currently provide enrollment data at the preschool level, and this data is not reflected in TABLE 3.15.1-1. Three counties have University of California campuses, and all but one county have one or more California State University campuses (see Table 3.15.1-2).

TABLE 3.15.1-1 Kindergarten through Grade 12 Enrollment and Teachers in the SCAG Region for the 2021–2022 School Year

COUNTY	ENROLLMENT K-12	TEACHERS
Imperial	36,238	1,689
Los Angeles	1,336,558	62,980
Orange	448,729	19,312
Riverside	420,687	18,479
San Bernardino	398,648	17,972
Ventura	128,227	5,895
SCAG Region	2,739,087	126,327
California	5,892,240	274,759

Source: CDE 2023b

TABLE 3.15.1-2 Public and Private Schools in the SCAG Region for the 2021–2022 School Year

	PUBLIC SCHOOLS ^A				COMMUNITY COLLEGE	PRIVATE SCHOOLS (ACTIVE)
COUNTY	DISTRICTS	SCHOOLS	UC SYSTEM ^B	CAL STATE SYSTEM ^c	DISTRICTS	K-12
Imperial	18	77	_	_	1	10
Los Angeles	80	2,293	1	5	13	866
Orange	28	639	1	1	4	284
Riverside	23	542	1	_	5	136
San Bernardino	33	592	_	1	8	143
Ventura	21	227	_	1	2	79
SCAG Total	203	4,370	3	8	33	1,516

Sources: a. CDE 2023b

b. University of California 2023

c. CSU 2023

d CCC 2023

IMPERIAL COUNTY

Imperial County has 18 school districts, 77 public schools, 10 private schools, four charter academies, and a community college, Imperial Valley College (CDE 2023b). Enrollment within the county peaked in school year 2017–2018 and has since declined. Within the County, 11 school districts have recently passed bond measures that will support new gymnasiums, classrooms, science labs, swimming pools, and three entirely new schools (ICOE 2020). Additionally, San Diego State University has a satellite campus in Imperial County, located in Calexico.

LOS ANGELES COUNTY

Los Angeles County Office of Education is the largest regional education agency in the U.S. and serves as an intermediary between the local school districts and the California Department of Education. The County is served by 80 public school districts, 2,293 public schools, 866 private schools, and 13 community college districts (CLAOE 2023; CDE 2023b). As with all of California, the districts operate independently of the County government and elected governing school boards are responsible for budgeting and decision-making.

ORANGE COUNTY

The Orange County Department of Education is comprised of 28 K–12 school districts, four community college districts, one alternative school, and a special education school. There are more than 639 public schools serving approximately 450,000 students (CODE 2023; CD 2023b). Although almost all of the Orange County schools are experiencing growth, the fastest growing districts are within South County: Saddleback Valley Unified School District and Capistrano Unified School District. The Orange County Department of Education also promotes a childcare program, offering before- and after school care for children of working parents, as well as youth and teen programs (CDE 2023b).

RIVERSIDE COUNTY

Within Riverside County, the Riverside County Office of Education (RCOE) provides educational and administrative support services to the 23 school districts and nearly 420,000 students living in the County, including five

community college districts (CDE 2023b). Beyond acting as an intermediary between the State and local school districts, the RCOE also supports or directly provides a variety of specialized needs, such as Special Education for the severely handicapped, Head Start, Migrant Education, Alternative Education through independent study, Community Schools and Juvenile Court Schools and Career Technical Education programs designed to teach workforce skills aiding future employment. The RCOE reports 542 public school sites, including 20 charter schools, and employs approximately 18,500 teachers and non-teaching school employees (CDE 2023b).

SAN BERNARDINO COUNTY

The San Bernardino County Superintendent of Schools manages approximately 400,000 students across more than 592 public schools in 33 districts and eight community college districts (CDE 2023b). The County also has eight Special Education Local Plan Areas, and three regional occupational programs (CDE 2023c), (CDE 2023d). The County Board of Supervisors exercises direct control over the County School System, which is under the jurisdiction of the State Board of Education.

VENTURA COUNTY

The Ventura County Office of Education (VCOE) oversees the County's 21 public school districts, which serve nearly 128,000 K–12 students, as well as two community college districts (CDE 2023b). The VCOE also promotes court and community schools, as well as special education facilities. The primary role of the office is to promote quality educational services to all students by providing leadership, support, assistance, and coordination to school districts and County operated programs through the provisions of administrative, educational, fiscal, and clerical services. In addition, the District provides professional development opportunities for teaching staff and hosts countywide academic competitions including the spelling bee, mock trail, and academic decathlon (CVOE 2023).

3.15.1.4 LIBRARY SERVICES

AMERICAN LIBRARY ASSOCIATION

In the mid-1960s, the American Library Association (ALA) established library standards for public libraries. The ALA recommends service criteria of 0.5 square feet of library space and 2.5 volumes per capita. Many jurisdictions have not identified individual service criteria and utilize the ALA recommendations to meet the demand for library services in an area.

IMPERIAL COUNTY

The County of the Imperial Free Library was founded in 1912 and serves county residents in unincorporated areas, as well as in the cities of Calipatria, Holtville, and Westmorland. There are currently four branches located in Salton City, Calipatria, Heber, and Holtville. The library facilities offer services for children and teens, such as homework assistance, education games, and college scholarship databases (County of Imperial Library 2023). Many incorporated cities within Imperial County also provide library services.

LOS ANGELES COUNTY

The County of Los Angeles Public Library is one of the largest public library systems in the U.S. The system maintains 86 libraries across seven library planning areas. The system is equipped with 7.5 million books, in addition to magazines, newspapers, government publications, reference materials, audio-visual media, adult, teen and children's programs, downloadable e-books, computers, and internet access (County of Los Angeles Library

2023). The County guidelines regarding facilities are a minimum of 0.5 gross square feet and 2.75 items (books and other library materials) per capita (CLADRP 2015). Many incorporated cities within Los Angeles County also provide their own library services.

ORANGE COUNTY

The Orange County Public Library provides library service to the unincorporated areas of Orange County plus the cities of Aliso Viejo, Brea, Costa Mesa, Cypress, Dana Point, Fountain Valley, Garden Grove, Irvine, Laguna Beach, Laguna Hills, Laguna Niguel, Laguna Woods, Lake Forest, La Habra, La Palma, Los Alamitos, Rancho Santa Margarita, San Clemente, San Juan Capistrano, Seal Beach, Stanton, Tustin, Villa Park, and Westminster. The library system operates 33 branch library facilities, which contain approximately 2.5 million volumes, as well as periodicals, pamphlets, audio and video recordings, graphics, maps, etc. The library system has determined a service standard of 0.2 square feet of library space per capita and it strives to locate facilities within a three-mile radius of the communities they serve (COPWDS 2015). Within Orange County, many incorporated cities also provide library services.

RIVERSIDE COUNTY

Riverside County operates a library system of 35 libraries, two book mobiles, two museums, and a Creation Station. Library management offices are in the City of Riverside while the bookmobiles travel to serve unincorporated communities in the Coachella Valley and in western Riverside County (County of Riverside Library System 2023). Between 2021 and 2022, the county library had approximately 1.5 million visitors and issued 39,572 new library cards (County of Riverside Library System 2021). Many incorporated cities within Riverside County also provide library services.

SAN BERNARDINO COUNTY

The San Bernardino County Library System (SBCL) maintains 32 branches, two book mobiles, and has an administration building in the City of San Bernardino (CSBL 2023). The SBCL provides library resources such as books, internet, youth and adult literacy services, and braille institute services. The SBCL is available to unincorporated communities as well as 25 incorporated communities within the County. Combined, the branch facilities and administrative office total over 358,000 square feet of building area (CSBLUSD 2019). In addition, many incorporated cities within San Bernardino provide library services.

VENTURA COUNTY

The Ventura County Library maintains 12 community branches across the County. The various branches provide services such as book and document loans, computer labs, meeting rooms, homework assistance, and STEAM events. The County Library also provides an adult literacy program and tutors, as well as an eLibrary. The Ventura County Library maintains over 300,000 print books, as well as a variety of music, movies, TV shows, magazines, toys, instruments, and sketch books (County of Ventura Library 2023). In the Fiscal Year 2020–2021, the County Library circulated over 371,000 physical and digital items and issued over 18,700 library cards (County of Ventura Library, Undated). Library services are also provided by many incorporated cities within Ventura County.

3.15.2 REGULATORY FRAMEWORK

3.15.2.1 FIRE PROTECTION

FEDERAL

FEDERAL EMERGENCY MANAGEMENT ACT

FEMA's mission is to lead the effort to prepare the nation for all hazards and effectively manage federal response and recovery efforts following any national incident. FEMA also initiates proactive mitigation activities, trains first responders, and manages the National Flood Insurance Program and the U.S. Fire Administration (FEMA 2023a).

DISASTER MITIGATION ACT OF 2000

The Disaster Mitigation Act of 2000 (42 U.S.C. Section 5121 note) was signed into law to amend the Robert T. Stafford Disaster Relief Act of 1988 (42 U.S.C. Sections 5121–5207). Among other things, this new legislation reinforces the importance of pre-disaster infrastructure mitigation planning to reduce disaster losses nationwide and is aimed primarily at the control and streamlining of the administration of federal disaster relief and programs to promote mitigation activities. Some of the major provisions of the Act include:

- Funding pre-disaster mitigation activities;
- Developing experimental multi-hazard maps to better understand risk;
- Establishing state and local government infrastructure mitigation planning requirements;
- Defining how states can assume more responsibility in managing the Hazard Mitigation Grant Program (HMGP); and
- Adjusting ways in which management costs for projects are funded.

The mitigation planning provisions outlined in Section 322 of the Act establish performance-based standards for mitigation plans and requires states to have a public assistance program (Advance Infrastructure Mitigation—AIM) to develop county government plans. The consequence for counties that fail to develop an infrastructure mitigation plan is the chance of a reduced federal share of damage assistance from 75 percent to 25 percent if the damaged facility has been damaged on more than one occasion in the preceding ten-year period by the same type of event (FEMA 2000).

STATE

CALIFORNIA CONSTITUTION ARTICLE XIII SECTION 35

Section 35 of Article III of the California Constitution at subdivision (a)(2) provides: "The protection of the public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Public safety services include fire protection. Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50 percent sales tax to be used exclusively for local public safety services. California Government Code (CGC) Sections 30051–30056 provide rules to implement Proposition 172. Section 30056 provides that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992–93 fiscal year. Therefore, an agency is required to use Proposition

172 to supplement its local funds used on fire protection, as well as other public safety services. In *City of Hayward v. Trustee of California State University* (2015) 242 Cal.App.4th 833, the court found that, Section 35 of Article XIII of the California Constitution requires local jurisdictions to provide fire services and that it is reasonable to conclude that a lead agency will comply with that provision and ensure that public services are provided (see *City of Hayward v. Trustee of California State University* [2015] 242 Cal.App.4th 833, 847, stating "the city has a constitutional obligation to provide adequate fire protection services").

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 2019 California Fire Code is the incorporation of the 2018 International Fire Code of the International Code Council with necessary California amendments. Development under the proposed project would be subject to applicable regulations of the California Fire Code (International Code Council 2019).

TITLE 8 CALIFORNIA CODE OF REGULATIONS SECTIONS 1270 AND 6773

In accordance with C.C.R., Title 8 Sections 1270 "Fire Prevention" and 6773 "Fire Protection and Fire Equipment," the California Occupational Safety and Health Administration (Cal OSHA) has established minimum standards for fire suppression and emergency medical services. The standards include, but are not limited to, guidelines on the handling of highly combustible materials, fire hose sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance, and use of all firefighting and emergency medical equipment (CPIR 1994).

TITLE 14 CALIFORNIA CODE OF REGULATIONS DIVISION 1.5

These regulations constitute the basic wildland fire protection standards of the California Board of Forestry. They have been prepared and adopted for the purpose of establishing minimum wildfire protection standards in conjunction with building, construction, and development in state recreation areas. Title 14 regulates that the future design and construction of structures, subdivisions, and developments in a state recreation area shall provide for basic emergency access and perimeter wildfire protection measures (BFFP 2019).

UNIFORM FIRE CODE

The Uniform Fire Code (UFC) contains regulations relating to construction, maintenance, and use of buildings. Topics addressed in the code include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings and the surrounding premises.

CALIFORNIA HEALTH AND SAFETY CODE

State fire regulations are set forth in Sections 13000 et seq. of the California Health and Safety Code, which includes regulations for building standards (as set forth in the California Building Code), fire protection and notification systems, fire protection devices, and fire suppression training.

MUTUAL AID AGREEMENTS

The Emergency Managers Mutual Aid (EMMA) system is a collaborated effort between city and county emergency managers in the OES in the coastal, southern, and inland regions of the state. EMMA provides service in the emergency response and recovery efforts at the Southern Regional Emergency Operations Center (REOC), local Emergency Operations Centers (EOC), the Disaster Field Office (DFO), and community service centers. The purpose of EMMA is to support disaster operations in affected jurisdictions by providing professional emergency management personnel. In accordance with the Master Mutual Aid Agreement, local and state emergency managers have responded in support of each other under a variety of plans and procedures (Cal OES 2019).

GOVERNOR'S OFFICE OF EMERGENCY SERVICES REGULATORY PROGRAM

In 2009, the Governor's Office of Emergency Services (OES) merged with the Office of Homeland Security (OHS) under provisions set forth under Assembly Bill 38, creating the California Emergency Management Agency (Cal EMA) and authorizing it to prepare a Standard Emergency Management System (SEMS) program. In July 2013, Governor Brown eliminated Cal EMA and restored it to the Governor's Office, renaming it the California Governor's Office of Emergency Services (Cal OES), and merging it with the Office of Public Safety Communications (California Government Code, Title 2, Division 3, Part 6.5, Chapter 3: Public Safety Communications [15278–15283]).

Cal OES serves as the lead state agency for emergency management in the state. Cal EMA coordinates the state response to major emergencies in support of local government. The primary responsibility for emergency management resides with local government. Local jurisdictions first use their own resources and, as they are exhausted, obtain more from neighboring cities and special districts, the county in which they are located, and other counties throughout the state through the statewide mutual aid system. In California, the Standardized Emergency Management System (SEMS) provides the mechanism by which local government requests assistance. Cal OES serves as the lead agency for mobilizing the state's resources and obtaining federal resources; it also maintains oversight of the state's mutual aid system (California Government Code, Title 2, Division 1, Chapter 7, Article 5, Office of Emergency Services [8585–8589.7]).

Cal OES 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, Cal OES coordinates with federal agencies, such as the DHS and FEMA, as well as other state and local jurisdictions such as the CHP. California's vision, mission, and principles for emergency management, as well as goals and objectives are located in its 2017 Strategic Plan (Cal OES 2017).

2018 STRATEGIC FIRE PLAN FOR CALIFORNIA

Strategic Fire Plans in California have been developed since the 1930s by the Board of Forestry and Fire Protection and are periodically updated to guide CAL FIRE in providing statewide fire protection of state responsibility areas. The 2018 Plan, an update to the 2010 Plan, reflects the effects of climate change and other environmental changes in the State. The 2018 Plan focuses on fire prevention and suppression, natural resource management, and the collaboration of fire protection and emergency service providers (BFFP 2018).

COMMUNITY FACILITIES ACT 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 consider physical characteristics such as square footage and structure size (California Tax Data, Undated).

LOCAL

COUNTY AND CITY GENERAL PLAN SAFETY ELEMENTS AND PUBLIC SERVICES AND FACILITIES ELEMENTS

In addition to federal and state regulations, cities and counties in the SCAG region also provide regulatory protection and advisement regarding public safety and associated 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 (California Government Code, Title 1, Division 1, Chapter 3, Article 5, Authority for and Scope of General Plan [65300–65303.4]). 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 standards at a County level:

IMPERIAL COUNTY

Fire Response Standards. The Imperial County General Plan does not establish fire response standards for unincorporated areas (CIPDS 2015). Incorporated cities within Imperial County have established fire response 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 (City of El Centro 2004).

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 S3.3.1) (CLADRP 2012). Incorporated cities within Los Angeles County have also established fire 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 Orange County's 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 (COPWDS 2015):

- 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
- 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
- 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.

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 minutes of travel time to fire incidents and EMS calls, and a full first-alarm group within 8 minutes, all for a minimum of 90 percent of annual incidents (Management Partners, Incorporated 2009). Incorporated cities within Riverside County have also established fire response standards.

SAN BERNARDINO COUNTY

Fire Response Standards. The San Bernardino County Fire Protection District established fire response standards for unincorporated areas, depending on service area type. For example, the response goal for urban areas is less than five minutes for the first arriving unit and for rural areas the response goal is 10 minutes for the first arriving unit (SBC LAFCO 2020). Incorporated cities within San Bernardino County have established fire response standards.

VENTURA COUNTY

Fire Response Standards. The Ventura County Fire Protection District maintains service contracts with ambulance services, which requires response time standards depending on service area type. Areas considered to be "Metropolitan or urban" areas generally have an 8-minute response time standard; "suburban" areas have a 20-minute standard; "semi-rural" areas have a 30-minute standard. "Very low population" or "wilderness" areas expect service as quickly as possible but do not have a defined response time standard (CVRMAPD 2020). Incorporated cities within Ventura County have also established fire response standards.

3.15.2.2 POLICE PROTECTION

STATE

All law enforcement agencies within the State of California are organized and operate in accordance with the applicable provisions of the California Penal Code. This code sets forth the authority, rules of conduct, and training for peace officers. Under state law, all sworn municipal and county officers are state peace officers.

CALIFORNIA CONSTITUTION, ARTICLE XIII SECTION 35

Refer to Section 3.15.2.1, Fire Protection, above, for a detailed discussion of this regulation.

CALIFORNIA PENAL CODE

All law enforcement agencies within the State of California are organized and operated in accordance with the applicable provisions of the California Penal Code. This code sets forth the authority, rules of conduct, and training for peace officers. Under state law, all sworn municipal and county officers are state peace officers.

CALIFORNIA EMERGENCY SERVICES ACT

For a detailed discussion of this regulation, refer to Section 3.15.2.1, Fire Protection

13 CALIFORNIA CODE REGULATIONS DIVISION 2

Division 2 of Title 13 of the California Code Regulations (CCR) governs the operations of the California Highway Patrol (CCR 2023).

CALIFORNIA VEHICLE CODE 21806 VC

California Vehicle Code 21806 VC states that drivers in California must yield to emergency vehicles when they are using sirens and have at least one visible red light. This is to ensure safe and timely access for emergency vehicles as they respond to emergency calls.

COMMUNITY FACILITIES ACT OF 1982, AS AMENDED

The Community Facilities Act of 1982 applies to police protection services. Refer to the discussion in Section 3.15.2.1, *Fire Protection*, for further information.

LOCAL

COUNTY AND CITIES GENERAL PLAN AND SAFETY ELEMENTS

Local planning policies related to public services and recreation are established in each local jurisdiction's general plan. In general, local jurisdictions have policies in place that state that public services must be provided at the same time as (or in advance of) the need for that service. In addition to these general policies, local jurisdictions may have more specific policies tailored to performance objectives, such as those outlined below.

Policies and strategies for police protection services generally include language pertaining to the development of law enforcement programs to reduce and control crime, the planning of future law enforcement facilities concurrently with growth, and the prevention of crime through education. Many jurisdictions also have specific

goals, such as maintaining a certain ratio of sworn officers to citizens, reducing response times, or reducing the overall number of crimes in the community.

Applicable County General Plan elements regarding police protection are identified below.

IMPERIAL COUNTY

Police Response Standards. The Imperial County General Plan does not establish police response standards for unincorporated areas (CIPDS 2015). However, individual incorporated jurisdictions have set standards, for instance, the El Centro Police Department's goal is to have 1.75 police officers per 1,000 population (City of El Centro 2004).

LOS ANGELES COUNTY

Police Response Standards. To effectively and efficiently fulfill all of its functions, the Sheriff's Department requires a staff level of one deputy sheriff per each 1,000 population (CLADRP 2015). Incorporated cities within Los Angeles County have also established police response standards.

ORANGE COUNTY

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 (COPWDS 2015). Incorporated cities within Orange County have also established police response standards.

RIVERSIDE COUNTY

Police Response Standards. The Riverside County Sheriff's Department has established a goal of maintaining 1 sworn officer per 1,000 population (CRPD 2015). According to EIR No. 521 for the 2015 County's General Plan, the Riverside County Sheriff's Department has established the following criteria for its staffing requirements in unincorporated areas of Riverside Count (CRPD 2015):

- One sworn officer per 1,000 population
- 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) (City of Riverside 2018).

SAN BERNARDINO COUNTY

Police Response Standards. The San Bernardino County General Plan does not establish police response standards for unincorporated areas (CSBLUSD 2007). Incorporated cities within San Bernardino County have established police response standards. For example, the City of Redlands desires a response time of 4–5 minutes (City of Redlands 2017).

VENTURA COUNTY

Police Response Standards. The Ventura County General Plan does not establish police response standards for unincorporated areas (CVRMAPD 2015). Incorporated cities within Ventura County have established police response standards. For instance, the City of Fillmore has established a desired level of one patrol officer per 1,000 population (City of Fillmore 1998).

3.15.2.3 SCHOOL SERVICES

STATE

COMMUNITY FACILITIES ACT OF 1982, AS AMENDED

The Community Facilities Act of 1982 applies to school services. Refer to Section 3.15.2.1, *Fire Protection*, above, for a detailed discussion of this regulation.

CALIFORNIA GOVERNMENT CODE

Section 53094 of the California Government Code allows the governing board of a school district to render city zoning ordinances inapplicable to a proposed use of property by a two-thirds vote of its members. This code does not require a school district to comply with the zoning ordinances of a county or city unless the zoning ordinance makes provision for the location of public schools and unless the city or county has adopted a general plan.

Section 65995 indicates that "[e]xcept for a fee, charge, dedication, or other requirement authorized under Section 17620 of the Education Code, or pursuant to Chapter 4.7 (commencing with Section 65970), a fee, charge, dedication, or other requirement for the construction or reconstruction of school facilities shall not be levied or imposed in connection with, or made a condition of, any legislative or adjudicative act, or both, by any state or local agency involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization, as defined in Section 56021 or 56073."

In addition, Section 65996 states that payment of fees pursuant to Education Code Section 17620 and Chapter 4.7 (commencing with Section 65970) of Division 1 of Title 7, shall be the exclusive methods of considering and mitigating impacts on school facilities that occur or might occur as a result of any legislative or adjudicative act, or both, by any state or local agency involving, but not limited to, the planning, use, or development of real property or any change of governmental organization or reorganization, as defined in Section 56021 or 56073. Section 65996 further states that "[t]he provisions of this chapter are hereby deemed to provide full and complete school facilities mitigation and, notwithstanding Section 65858, or Division 13 (commencing with Section 21000) of the Public Resources Code, or any other provision of state or local law, a state or local agency may not deny or refuse to approve a legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property or any change in governmental organization or reorganization, as defined in Section 56021 or 56073, on the basis that school facilities are inadequate."

CALIFORNIA EDUCATION CODE

Section 17620 of the California Education Code states that "[t]he governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities, subject to any limitations set forth in Chapter 4.9 (commencing with Section 65995) of Division 1 of Title 7 of the Government

Code." The fees, charges, dedications, or other requirements may be applied only to new commercial and industrial construction, to new residential construction, or to location, installation, or occupancy of manufactured homes and mobile homes, as defined in Section 17625.

UNIVERSAL PRESCHOOL ACT (SB 976)

Existing law (i.e., the Early Education Act), requires the Superintendent of Public Instruction, to, among other things, provide an inclusive and cost-effective preschool program. Existing law requires the Superintendent to develop standards for the implementation of high-quality preschool programs. This bill would rename the Early Education Act as the Universal Preschool Act, and would revise and recast the act to, among other things, require the State Department of Education, in consultation with the State Department of Social Services, to administer the universal preschool program. The bill would require the Superintendent and the Director of Social Services to convene a statewide coordination council to develop, among other things, goals, guidelines, and best practices to be used at a local level to implement a universal preschool program, as provided. The bill would require the Superintendent, in consultation with the Director of Social Services, to develop standards for the implementation of high-quality preschool programs in all settings, including, among other settings, transitional kindergarten. This bill would provide that the changes to law described above would become operative only upon an appropriation of funds by the Legislature for these purposes in the annual Budget Act or another statute.

LOCAL

DEVELOPER IMPACT FEES

One primary source for financing library facilities within the SCAG region and across the state is developer impact fees. These fees reduce impacts of residential developments; generally, developers can construct new library facilities or pay impact fees to the library to mitigate the impacts from a specific project. Fees vary depending on the jurisdiction in which the project is located.

3.15.2.4 LIBRARY SERVICES

STATE

COMMUNITY FACILITIES ACT OF 1982, AS AMENDED

The Community Facilities Act of 1982 applies to library services. Refer to Section 3.15.2.1, *Fire Protection*, above, for a detailed discussion of this regulation.

LOCAL

DEVELOPER IMPACT FEES

One primary source for financing library facilities within the SCAG region and across the state is developer impact fees. These fees reduce impacts of residential developments; generally, developers can construct new library facilities or pay impact fees to the library to mitigate the impacts from a specific project. Fees vary depending on the jurisdiction in which the project is located.

3.15.3 ENVIRONMENTAL IMPACTS

THRESHOLDS OF SIGNIFICANCE

For the purposes of this 2024 PEIR, SCAG has determined that implementation of Connect SoCal 2024 could result in significant impacts related to public services if the Plan would exceed the following significance criteria, in accordance with California Environmental Quality Act (CEQA) Guidelines Appendix G:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered fire
 protection facilities, need for new or physically altered fire protection facilities, the construction of which could
 cause significant environmental impacts in order to maintain acceptable service ratios, response times, or
 other performance objectives.
- Result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, need for new or physically altered police facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.
- Result in substantial adverse physical impacts associated with the provision of new or physically altered school
 facilities the construction of which could cause significant environmental impacts in order to maintain
 acceptable service ratios or other educational performance factors.
- Result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.
- Result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, or other performance objectives. (Note: This impact is discussed in Section 3.16, *Recreation*).

METHODOLOGY

Chapter 2, *Project Description*, describes the Plan's vision, goals, forecasted regional development pattern, policies and strategies, and individual transportation projects and investments. The Plan aims to increase mobility, promote sustainability, and improve the regional economy. Although land use development is anticipated to occur within the region even without the Plan, the Plan could influence growth, including distribution patterns. To address this, the 2024 PEIR includes an analysis on the implementation of the Plan including policies and strategies as well as potential projects to evaluate how conditions in 2050 under the Plan would differ from existing conditions. The analysis of public services considered public comments received on the NOP and feedback and discussions at the various public and stakeholder outreach meetings.

This 2024 PEIR analyzes the potential for the Plan to result in the need for new public service facilities (i.e., fire and polices stations, schools, and libraries) and the associated potential for construction and subsequent operation of such facilities to cause physical environmental impacts. The methodology for determining the significance of impacts on public services compares existing conditions (2022 or most recent data available – see Section 3.0, *Introduction to the Analysis*, for a discussion of baseline) to the expected future use of public services under Connect SoCal 2024 in 2050. Due to the size of the region, a detailed analysis of individual fire/police stations,

schools or school districts, and libraries and their capacity is not feasible. As such, the analysis focuses on region wide capacity and impacts. The analysis of these impacts is programmatic at the regional level.

The need for or deficiency in adequate public services in and of itself is not a CEQA impact, but a social or economic impact (*City of Hayward v. Board of Trustees* [2015] 242 Cal.App.4th 833, 843). In accordance with CEQA, this 2024 PEIR analysis focuses on the extent to which the Plan promotes growth patterns resulting in a need for additional public services that results in the construction of new facilities or additions to existing facilities. The impact from that construction and/or facilities operation would result in a potential impact to the environment. An increase in population, by itself, would not necessarily increase demand for public services and associated facilities.

Fire and police protection service needs are dependent on various factors, including the size of the service population and the geographic area served, the number and types of calls for service, the characteristics of a project and its surrounding community, as well as available existing facilities and staffing in an area.

In Goleta Union School District v Regents of University of California (1995) 37 Cal. App. 4th 1025, the court held that school overcrowding is a social impact and does not require analysis in an EIR and mitigation measures, unless the overcrowding is linked to physical environmental effects (such as new school construction). However, the law is somewhat unclear on how to analyze impacts from school facilities.

The statutes significantly limit the application of CEQA to school facilities impact issues. The fees set forth in Government Code Section 65996 constitute the exclusive means of both "considering" and "mitigating" school facilities impacts of projects (Government Code Section 65996(a)). Because the statute states that the statutory fees are the exclusive means of considering, as well as mitigating, school impacts, it limits not only the mitigation measures that may be required but also the scope of impact review in CEQA documents and the findings for school impacts. State and local jurisdictions may not deny either legislative or adjudicative approvals on the basis of a refusal to pay fees in excess of those limits (Government Code Section 65995). In *Chawanakee Unified School District v County of Madera* (2011) 196 CA 4th 1016, the court held that because the methods in the statute are the exclusive means of "considering" impacts on schools, an EIR need not describe and analyze a development's impacts on schools. Consistent with this view:

Once the statutory fee is imposed, the impact should be determined to be mitigated because of the provision that the statutory fees constitute full and complete mitigation (Government Code Section 65995(b)); and

It should not be necessary to adopt a statement of overriding considerations for school facilities impacts when the statutory fee is assessed, because the impact is deemed as a matter of law to be adequately mitigated (Government Code Section 65995(b)).

The Chawanakee court also ruled that the reach of the statute is limited to impacts "on" schools and does not extend to impacts on the non-school physical environment, even though they may be "related" to schools in some way. The implications of this ruling are uncertain, however, because the court did not consider the effect of Government Code Section 65995(b), which states that the statute provides full school facilities mitigation notwithstanding CEQA, or of Government Code Section 65995(c), which defines a school facility as "any school-related consideration relating to a school district's ability to accommodate enrollment."

Based on the above and the uncertainty created by the *Chawanakee* decision related to impacts to non-school property from the construction of school facilities, for purposes of this 2024 PEIR, an impact on schools would occur if the Plan promotes growth patterns resulting in the need for and/or the provision of new or physically

altered public school facilities, the construction of which would cause significant environmental impacts in order to maintain classroom sizes or other performance objectives. The determination of whether there is a significant impact related to schools is based on whether a significant impact would result from the construction of new or expanded school facilities on non-school property.

Library service needs are dependent on various factors, including the size of the population within the respective geographical areas served, the number of library cardholders within the library system, the characteristics of a project and its surrounding community, as well as available existing facilities and staffing in an area.

As discussed in Chapter 2, *Project Description*, and Section 3.0, *Introduction to the Analysis*, Connect SoCal 2024 includes Regional Planning Policies and Implementation Strategies some of which will effectively reduce impacts in the various resource areas. Furthermore, compliance with all applicable laws and regulations (as set forth in the Regulatory Framework) would be reasonably expected to reduce impacts of the Plan (see CEQA Guidelines Section 15126.4(a)(1)(B)). As discussed in Section 3.0, *Introduction to the Analysis*, where remaining potentially significant impacts are identified, SCAG mitigation measures are incorporated to reduce these impacts. If SCAG cannot mitigate impacts of the Plan to less than significant, project-level mitigation measures are identified which can and should be considered and implemented by lead agencies as applicable and feasible.

IMPACTS AND MITIGATION MEASURES

IMPACT PS-1

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

Significant and Unavoidable Impact - Mitigation Required

Impacts to fire protection services are associated with the physical impacts that would occur from construction and operation of new facilities. Service ratios and response times are tools that jurisdictions use to determine the need for such facilities, but do not necessarily indicate a significant impact under CEQA. The ability to provide adequate fire protection services is dependent on numerous factors including staffing levels, mutual aid agreements, deployment strategies, and technological advances in equipment. In conformance with California Constitution Article XIII Section 35(a)(2), existing policies, procedures, and practices related to fire protection and emergency services, fire departments would maintain acceptable emergency response times through the provision of additional personnel and equipment as needed, as well as potentially constructing new or expanding existing fire and emergency response facilities.

As described above, fire and emergency services in the SCAG region are provided by numerous agencies within multiple jurisdictions. Plan transportation projects include grade crossings, arterials, interchanges, and auxiliary lanes. Additionally, implementation of Plan policies and strategies could include a range of project uses and sizes comprising all the kinds of development anticipated in the region through 2050. Depending upon timing, location, and duration, construction activities for projects, implemented of the Plan could delay emergency vehicle response times or otherwise disrupt delivery of emergency services. Impacts to emergency response plans and roadway access for emergency response vehicles during construction of these projects is addressed in Section 3.9, *Hazards*

and Hazardous Materials, of this 2024 PEIR. As discussed therein, impacts to emergency response vehicle access during construction activities would not typically result in a determination by a jurisdiction that new facilities would be required; however, due to the size of the region, the number of transportation and land use development projects that would occur in the region through 2050, and potential for unusual circumstances to occur, emergency access impacts are determined to be significant even with mitigation.

Transportation projects included in the Plan that involve transit, passenger rail, and active transportation are largely 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 increase in density, additional fire protection and emergency response services and associated facilities 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 stations to accommodate additional equipment and greater number of personnel or the construction of new stations, which are more strategically located and capable of reducing response times 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.

Construction activities associated with projects implemented as a result of the Plan may temporarily increase demand on fire protection and emergency medical services. Construction activities could potentially expose combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, exposed electrical lines, chemical reactions in combustible materials and coatings and lighted cigarettes. However, in compliance with Cal-OSHA requirements, construction managers and personnel for individual projects would be trained in emergency response and fire safety operations. Additionally, fire suppression equipment (e.g., fire extinguishers) specific to construction are required to be maintained on individual development sites.

By 2050, the SCAG region is expected to grow by nearly 2.1 million people. According to the Plan, it is projected that the majority of new household growth and employment growth would be planned in PDAs (see Map 2-9, Priority Development Areas, in Chapter 2, *Project Description*). As such, existing facilities and services could become overburdened during the lifetime of the Plan.

The Plan's forecasted regional development pattern seeks to encourage and facilitate infill and redevelopment that minimizes the consumption of open space. Therefore, it is likely that most growth will occur in areas already well-served by fire protection services and equipment. However, with increasing density it is anticipated that construction of new facilities will be needed to serve the new uses. In some areas existing facilities may need to be expanded, and/or additional facilities constructed.

While construction of fire protection facilities does not typically result in substantial environmental impacts, the location, size, design, and proximity to sensitive receptors of new facilities are not known at this time. Fire protection facilities are generally anticipated to be located on infill lots that are between 0.5 and 1 acre in size. In urbanized areas, new facilities would not involve expansion of the urban sphere beyond current boundaries and, thus, there would be no need for new or expanded infrastructure. As an example, in the City of Los Angeles, there are four basic configurations for fire stations, the typical standard fire/paramedic station consists of a 15,250-square-foot building on a parcel that is approximately one acre. Based on the urban location and the relatively small size of typical facilities, the construction of a new fire facility or expansion of an existing facility would typically qualify for an infill exemption or result in less—than-significant impacts with standard regulatory compliance

measures and design features. However, it is acknowledged that there may be a need to construct some fire stations outside of urban areas, which could involve additional potential effects. As such, given the size of the region, the amount of projected growth anticipated to occur through 2050, and the variability in site conditions, it is reasonably foreseeable that unusual circumstances could result in adverse effects associated with construction of new facilities in both urban, suburban, and rural settings.

Construction and operation of fire stations could have impacts similar to other development projects analyzed throughout this 2024 PEIR, including impacts to aesthetics, air quality, noise, cultural resources, and utilities. Noise impacts of emergency service provider facilities, which are unique to this type of operation, can affect nearby sensitive receptors but such site-specific impacts are not reasonably foreseeable at this time. In any event, construction of these facilities would comply with all applicable laws, regulations, and ordinances, and mitigation measures would be required to address potentially significant impacts.

While the 2024 PEIR analyzes anticipated effects of regional transportation projects and growth related to air quality, noise, traffic, utilities, and other environmental impact areas, given the increased growth as well as densified development (e.g., more families living and/or working there), implementation of Connect SoCal 2024 could result in the need for construction of new or physically altered fire protection and emergency response facilities in order to maintain acceptable service ratios. Although details regarding the specific location and size of such facilities are not currently available, given the size of the region and increase in need for fire protection, impacts are considered significant and mitigation measures are required.

MITIGATION MEASURES

SCAG MITIGATION MEASURES

See SMM-GEN-1, SMM-HYD-1, SMM-WF-1, and SMM-WF-2.

PROJECT-LEVEL MITIGATION MEASURES

See PMM AES-1, PMM AQ-1, PMM AQ-2, PMM-BIO-1, PMM-BIO-2, PMM-BIO-4, PMM-BIO-5, PMM-CUL-1, PMM-CUL-2, PMM-GEO-1, PMM-GEO-2, PMM-GHG-1, PMM-HAZ-2 through PMM-HAZ-4, PMM-NOI-1, PMM-NOI-2, PMM-TCR-1, PMM-UTIL-1, and PMM-WF-2.

PMM-PSP-1

- In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered fire and police facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:
- a) Coordinate with fire and police protection services agencies to ensure that there are adequate facilities to maintain acceptable service ratios, response times or other performance objectives for fire and police protection services and that any required additional construction of buildings is incorporated into the project description.
- b) Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements for fire and police protection services facilities, as appropriate and applicable, to mitigate identified CEQA impacts.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

As previously discussed, the Plan's Regional Planning Policies and Implementation Strategies (see Chapter 2, *Project Description*, and Section 3.0, *Introduction to the Analysis*) and compliance with existing laws and regulations would reduce impacts; however, given the regional scale of the analysis in this 2024 PEIR, it is not possible or feasible to determine if all impacts would be fully mitigated. Therefore, this 2024 PEIR identifies SCAG and project-level mitigation measures. At the project-level, lead agencies can and should consider the identified project-level mitigation measures during subsequent review of transportation and land use projects as appropriate and feasible. While the mitigation measures will reduce the impacts related to the construction of new or physically altered public services facilities which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact could be *significant and unavoidable* even with mitigation.

IMPACT PS-2

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

Significant and Unavoidable Impact – Mitigation Required

Impacts to police protection services are associated with the physical impacts that could occur from construction and operation of new facilities. Service ratios and response times are tools that jurisdictions use to determine the need for such facilities, but do not necessarily indicate a significant impact under CEQA.

New Light Rail Transit (LRT) and commuter rail routes/extensions in Los Angeles, Orange, Riverside, and San Bernardino counties, as well as transit-related projects, would involve the development of new transit stations. Operation of these new transit stations would require additional security services to protect the public. In some cases, such as with Metro, the governing transit authority provides security as an element of the project, which would reduce the need for public protective security services. The Plan encourages increased transit use that could result in an increased need for protective security services for transit users and employees.

Connect SoCal 2024 would encourage and facilitate new growth in PDAs that would provide for more walkable, mixed-use communities and development with more transportation options. According to the Plan, it is projected that the majority of new household growth and employment growth would be planned in PDAs (see Map 2-9, Priority Development Areas, in Chapter 2, *Project Description*). PDAs are located in both suburban and urban areas, throughout the SCAG region. As these areas experience more people working and living there, additional police services would be required. As a result, the Plan would have the potential to increase the need for police services, usually in proportion to the densified environment or anticipated population growth in a given area. This would likely increase the staffing of sworn officers and create a potential need to construct new stations to ensure acceptable levels of service that would have the potential to result in physical alterations and related significant effects on the environment. As discussed under in Impact PS-1, above, the construction of police protection facilities does not typically result in substantial environmental impacts. However, similar to fire protection facilities, the location, size, design, and proximity to sensitive receptors of new facilities is not known at this time.

Police services are provided by several agencies within multiple jurisdictions. Local jurisdictions are required to determine the degree of impact to police services and comply with state, county, and city requirements to protect public safety.

Impacts related to emergency response planning and emergency access during construction and operation of land use projects resulting from implementation of the Plan are discussed in Section 3.9, *Hazards and Hazardous Materials*.

The Plan seeks to encourage and facilitate infill and redevelopment that minimizes the consumption of open space. Therefore, it is likely that growth will occur in areas already well-served by police protection providers with existing facilities. However, with increasing density it is anticipated that construction of new facilities will be needed to serve the new uses. In some areas, existing facilities may need to be expanded, and/or additional facilities constructed. While construction of police protection facilities does not typically result in substantial environmental impacts the location, size, design, and proximity to sensitive receptors of new facilities are not known at this time. Construction and operation of police stations could have impacts similar to other development projects analyzed throughout this 2024 PEIR, including impacts to aesthetics, air quality, noise, cultural resources, and utilities.

Noise impacts of police stations are unique to emergency responders and can affect nearby sensitive receptors. However, such site-specific impacts are not reasonably foreseeable. In any event, construction of these facilities would comply with all applicable laws, regulations, and ordinances, and mitigation measures would be required to address potentially significant impacts.

While the 2024 PEIR analyzes anticipated effects of regional transportation and growth related to air quality, noise, traffic, utilities, and other environmental impact areas, given the increased growth as well as densified development in some areas and new development in less urbanized areas, the Plan could contribute to the need for construction of new or physically altered police facilities in order to maintain acceptable service ratios. Because the location and size of such facilities is not reasonably foreseeable, impacts are considered significant and mitigation measures are required.

MITIGATION MEASURES

SCAG MITIGATION MEASURES

See SMM-HYD-1, SMM-LU-1 through SMM-LU-3, SMM-POP-1, and SMM-POP-2.

PROJECT-LEVEL MITIGATION MEASURES

See PMM AES-1, PMM AQ-1, PMM AQ-2, PMM-BIO-1, PMM-BIO-2, PMM-BIO-4, PMM-BIO-5, PMM-CUL-1, PMM-CUL-2, PMM-GEO-1, PMM-GEO-2, PMM-GHG-1, PMM-HAZ-2 through PMM-HAZ-4, PMM-NOI-1, PMM-NOI-2, PMM-PS-1, PMM-TCR-1, PMM-UTIL-1, and PMM-WF-2.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

As previously discussed, the Plan's Regional Planning Policies and Implementation Strategies (see Chapter 2, *Project Description*, and Section 3.0, *Introduction to the Analysis*) and compliance with existing laws and regulations would reduce impacts; however, given the regional scale of the analysis in this 2024 PEIR, it is not possible or feasible to determine if all impacts would be fully mitigated. Therefore, this 2024 PEIR identifies SCAG and project-level mitigation measures. At the project-level, lead agencies can and should consider the identified project-level

mitigation measures during subsequent review of transportation and land use projects as appropriate and feasible. While the mitigation measures will reduce the impacts related to the construction of new or physically altered public services facilities which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact could be **significant and unavoidable** even with mitigation.

Impact PS-3

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

Significant and Unavoidable Impact - Mitigation Required

Total population in the region is anticipated to increase by nearly 2.1 million people over the lifetime of the Plan (with or without the Plan); some of this population increase would include school age children (SCAG 2023). According to SCAG's Demographics and Growth Technical Report, the share of children will decline by 5.33 percent by 2050, but school age children will continue to make up a large share of the overall population.

Based on the 2021 enrollment of approximately 2.7 million students in the SCAG region (approximately 14.5 percent of an overall 2020 population of 18.8 million), and considering the projected growth scenario for 2050, SCAG has projected the number of children enrolled in K–12 schools to increase by approximately 298,000 students (SCAG 2023). This calculation assumes that the percent of school age children within the SCAG region remains constant at 14.5 percent, the increase in the number of students would be approximately 558,000 students, or 14.5 percent of the anticipated increase of 2.1 million people for the SCAG region over the lifetime of the Plan. It is anticipated that this increase in population and households would be largely in existing communities and PDAs which would require expansion of existing schools and construction of new schools in the region. However, it is important to note that many public schools have experienced actual declines in enrollment as a result of potentially converging factors such as declining birth rates, population shifts towards more affordable areas, and the growth of charter schools.

The 2020 COVID-19 pandemic accelerated the pace of declining enrollment trends, thus creating financial strains on school districts across the SCAG region. For example, in the largest district in the region, Los Angeles Unified School District (LAUSD), due to the pandemic and other ongoing trends, enrollment is predicted to decline by 30 percent over the next decade (LA Times 2022). In 2021, SB 976 replaced the Early Education Act with the Universal Preschool Act, whose aim is to provide a universal preschool program that will be free and available to all three and four-year-olds in the state by 2025–2026. The Plan encourages and facilitates growth in existing urban and suburban communities within the SCAG region such as PDAs (see Map 2-9, Priority Development Areas, in Chapter 2, *Project Description*).

School standards, performance measures, and related policies are set for public schools in school district long-range plans. To meet increased demand, existing schools would likely need additional facilities and other resources to maintain adequate educational standards. In some cases, depending on the pattern of development, it could be necessary to construct new schools as has been the case in Orange County's Saddleback Valley Unified School

District. Such construction could have impacts on aesthetics, air quality, cultural resources, noise, transportation, as well as other public services and utilities.

It is assumed that if new or expanded schools are determined to be necessary, such facilities could occur in proximity to residential uses. As allowed under Section 53094 of the California Government Code, school districts have the authority to render city zoning ordinances inapplicable, and thus may exempt schools from complying with local zoning regulations. Depending on the location of new schools, impacts related to site conditions and proximity to sensitive receptors could occur. Such impacts are not reasonably foreseeable without information as to design, location and proximity to the population to be served. Further, any significant impacts that could result from the unique characteristics of a specific project site, or specific characteristics of a given school (e.g., night lighting and performance spaces) would be speculative at this time. The construction of school facilities would be subject to project-specific CEQA review. The 2024 PEIR analysis of effects of regional transportation and growth with respect to air quality, noise, traffic, utilities, and other environmental impact areas, would include impacts of expanded and new schools. Given the increased growth as well as densified development, the Plan could contribute to substantial adverse physical impacts associated with the construction and subsequent operation of new or physically altered school facilities. As such, impacts are considered significant and mitigation measures are required.

MITIGATION MEASURES

SCAG MITIGATION MEASURE

See SMM-GEN-1, SMM-LU-1 through SMM-LU-3, SMM-POP-1, and SMM-POP-2.

PROJECT-LEVEL MITIGATION MEASURES

See PMM AES-1, PMM AQ-1, PMM AQ-2, PMM-BIO-1, PMM-BIO-2, PMM-BIO-4, PMM-BIO-5, PMM-CUL-1, PMM-CUL-2, PMM-GEO-1, PMM-GEO-2, PMM-GHG-1, PMM-HAZ-2 through PMM-HAZ-4, PMM-NOI-1, PMM-NOI-2, PMM-TCR-1, PMM-UTIL-1, and PMM-WF-2.

PMM-PS-2

- In accordance with provisions of Sections 15091(a)(2) and 15126.4(a)(1)(B) of the CEQA Guidelines, a lead agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered school facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the lead agency:
- Where construction or expansion of school facilities is required to meet public school service ratios, support expansion of such facilities, for example by ensuring safe routes to schools.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

As previously discussed, the Plan's Regional Planning Policies and Implementation Strategies (see Chapter 2, *Project Description*, and Section 3.0, *Introduction to the Analysis*) and compliance with existing laws and regulations would reduce impacts; however, given the regional scale of the analysis in this 2024 PEIR, it is not possible or feasible to determine if all impacts would be fully mitigated. Therefore, this 2024 PEIR identifies SCAG and project-level mitigation measures. At the project-level, lead agencies can and should consider the identified project-level mitigation measures during subsequent review of transportation and land use projects as appropriate and feasible. While the mitigation measures will reduce the impacts related to the construction of new or physically altered public services facilities which could cause significant environmental impacts in order to maintain acceptable

service ratios, response times, or other performance objectives, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact could be **significant and unavoidable** even with mitigation.

IMPACT PS-4

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

Significant and Unavoidable Impact – Mitigation Required

Population in the SCAG region is anticipated to increase by nearly 2.1 million people over the next 25 years, with or without Connect SoCal 2024. As discussed above, the counties within the SCAG region all have different service criteria for library services, with some counties not having set any at the time of this 2024 PEIR. Due to the 2020 COVID-19 pandemic, public libraries, particularly servicing underserved populations, were especially impacted by closures resulting from lockdowns. Despite the challenges resulting from the pandemic, public libraries have continued to provide library services while also providing on-site community services, such as providing a location to apply for passports and vaccination centers. Additionally, public libraries continue to advance strategic efforts towards implementing universal broadband access across the country. In response to the fiscal challenges facing public libraries during the COVID-19 pandemic, federal funding legislation and other relief funds were created and implemented. The ALA COVID Library Relief Fund, a \$1.25 million program, assisted libraries across the country experiencing COVID-related economic hardship. As part of the American Rescue Plan Act of 2021, the Emergency Connectivity Fund (ECF) program made \$7.17 billion available to libraries and schools to purchase and distribute technology necessary for remote learning, working from home, virtual healthcare visits, and more. The Infrastructure Investment and Jobs Act, signed into law in November 2021, provided \$43 billion for broadband deployment and \$2.75 billion through the Digital Equity Act. Currently, 93 percent of public libraries provide or are planning to provide free Wi-Fi access, even when their buildings are closed to the public; 44 percent of public libraries have moved routers outdoors to improve public access, and 23 percent of libraries also provide Wi-Fi hotspots for patrons to use at home (American Library Association 2022).

New transportation facilities, especially those in urban areas, could facilitate access to libraries and result in increased use of some libraries. In addition, the anticipated growth in population and households would increase demand, which may result in a need for new and/or expanded library facilities. As communities grow, the need for library facilities is assessed by each local jurisdiction and additional facilities are constructed in accordance with capital investment plans and budgets. Depending on the location of any expanded or new library facilities, site-specific impacts could occur. The 2024 PEIR analysis of effects of regional transportation and growth with respect to air quality, noise, traffic, utilities, and other environmental impact areas, would include impacts of expanded and new libraries. Although the construction of these facilities would be subject to project-specific CEQA review, given the size of the region, the increased growth as well as densified development under the Plan, the potential number of library facility projects being implemented through 2050, and potential for unusual circumstances to occur with any given project, it is reasonably foreseeable that the Plan could contribute to substantial adverse physical impacts associated with the construction and subsequent operation of new or physically altered library facilities. As such, impacts are considered significant and mitigation measures are required.

MITIGATION MEASURES

SCAG MITIGATION MEASURE

SMM-GEN-1, SMM LU-1 through SMM-LU-3, SMM-POP-1, and SMM-POP-2.

PROJECT-LEVEL MITIGATION MEASURE

See PMM AES-1, PMM AQ-1, PMM AQ-2, PMM-BIO-1, PMM-BIO-2, PMM-BIO-4, PMM-BIO-5, PMM-CUL-1, PMM-CUL-2, PMM-GEO-1, PMM-GEO-2, PMM-GHG-1, PMM-HAZ-2 through PMM-HAZ-4, PMM-NOI-1, PMM-NOI-2, PMM-TCR-1, PMM-UTIL-1, and PMM-WF-2.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

As previously discussed, the Plan's Regional Planning Policies and Implementation Strategies (see Chapter 2, *Project Description*, and Section 3.0, *Introduction to the Analysis*) and compliance with existing laws and regulations would reduce impacts; however, given the regional scale of the analysis in this 2024 PEIR, it is not possible or feasible to determine if all impacts would be fully mitigated. Therefore, this 2024 PEIR identifies SCAG and project-level mitigation measures. At the project-level, lead agencies can and should consider the identified project-level mitigation measures during subsequent review of transportation and land use projects as appropriate and feasible. While the mitigation measures would reduce the impacts related to the construction of new or physically altered public services facilities that could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives, due to the regional nature of the analysis, unknown site conditions and project-specific details, and SCAG's lack of land use authority over individual projects, SCAG finds that the impact could be *significant and unavoidable* even with mitigation.

IMPACT PS-5

Result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, or other performance objectives.

As discussed in Section 3.0, *Introduction to the Analysis*, due to the similarities of the topic areas, Impact PS-5 is addressed together with Impact REC-2 in Section 3.16, *Recreation*, of this 2024 PEIR.

CUMULATIVE IMPACTS

Connect SoCal 2024 is a regional-scale Plan comprised of policies and strategies, a regional growth forecast and land use pattern, and individual transportation projects and investments. At this regional-scale, a cumulative or related project to the Plan is another regional-scale plan (such as Air Quality Management Plans within the region) and similar regional plans for adjacent regions. Because the Plan, in of itself, would result in significant adverse environmental impacts with respect to public services, these impacts would add to the environmental impacts of other cumulative or related projects. Mitigation measures that reduce the Plan's impacts would similarly reduce the Plan's contribution to cumulative impacts.

3.15.4 SOURCES

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CHAPTER 3 Environmental Setting, Impacts, and Mitigation Measures 3.15 Public Services

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