IV. ENVIRONMENTAL IMPACT ANALYSIS

L. PUBLIC SERVICES -

FIRE AND SHERIFF PROTECTION SERVICES

ENVIRONMENTAL SETTING

Regulatory Framework

State of California

California Building Code

California Code of Regulations, Title 24, California Building Code (the "CBC") is a compilation of building standards, including fire safety standards for residential and commercial buildings. CBC standards are based on: (1) building standards that have been adopted by state agencies without change from a national model code; (2) building standards based on a national model code that have been modified to address particular California conditions; and (3) building standards authorized by the California legislature, not covered by the national model code. The California Fire Code (the "CFC") is part of the CBC. Typical fire safety requirements of the CFC include: (1) the installation of sprinklers in all high-rise buildings; (2) the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and (3) the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas. The CFC applies to all occupancies in California, except where more stringent standards have been adopted by local agencies. Specific CFC regulations have been incorporated by reference in the Los Angeles County (the "County") Fire Code.

Cal-OSHA

The California Department of Industrial Relations (Cal-OSHA) provides details on fire protection and prevention (Division 1, Chapter 4, Article 36) for construction safety. A general requirement is that the employer shall be responsible for the development of a fire protection program to be followed throughout all phases of the construction work; and shall provide fire fighting equipment. As fire hazards occur, there shall be no delay in providing the necessary fire protection and/or prevention equipment.

County of Los Angeles

Office of Emergency Management

The Office of Emergency Management was established by Chapter 2.68 (Emergency Services) of the County Code with responsibility for organizing and directing the preparedness efforts, as well as the day-

to-day coordination efforts, for the County's Emergency Management Organization, including the following:[1]

- Planning and Coordination
- Maintaining an approved Operational Area Emergency Response Plan
- Providing ongoing leadership and coordinating disaster plans and exercises with the 88 cities, 137 unincorporated communities and 288 special districts in the County
- Assisting County departments to develop emergency plans which address how they will perform both their non-deferrable missions and Operational Area duties during disasters
- Assisting County departments with development of facility emergency plans for every occupied County facility
- Supporting and advising the Board of Supervisors, Emergency Management Council and Emergency Preparedness Commission
- Supporting and advising the Board of Supervisors in matters pertaining to their role as elected officials during emergencies and disasters
- Operations
- Maintaining the County Emergency Operations Center in a state of operational readiness, in partnership with the Sheriff's Emergency Operations Bureau
- Serving as on-call County Emergency Operations Center first responders on a 24-hour basis
- Providing an Office of Emergency Management duty officer on a 24-hour basis to address inquiries and concerns from County, local, and state officials regarding potential or escalating emergency conditions
- Training

[1] *County of Los Angeles, Chief Executive Office, Office of Emergency Management, About OEM, http://www.lacoa.org/aboutoem.html, June 16, 2016.*

- Maintaining a cadre of County Emergency Operations Center team members trained in section and position responsibilities and use of the Emergency Management Information System Operational Area Response and Recovery System

- Providing ongoing training for County Department Emergency Coordinators and Building Emergency Coordinators

- Technical Operations

- Developing and maintaining the Operational Area Response and Recovery System linking County departments

- Public Education

- Conducting public education campaign for all hazards through the Emergency Survival Program, expos, public venues and various media presentations

City of La Cañada Flintridge Municipal Code

Title 4 of the City of La Cañada Flintridge (LCF) Municipal Code formally adopts the 2014 Los Angeles County Fire Code as the fire code of the City. According to Section 104.1.1, members of the fire department are authorized to enforce all ordinances of the jurisdiction and laws of the state pertaining to the following:

- The maintenance of fire protection and the elimination of fire hazards on land and in buildings, structures, and other property, including those under construction; and
- The maintenance of means of egress.

Existing Facilities

Fire

Battalion 4 of Los Angeles County Fire Department (LACFD) provides firefighting and emergency response services to the Project site and surrounding area. Fire Station No. 82 (Battalion 4 headquarters) located at 352 Foothill Boulevard in LCF Boulevard is the fire station closest to the Project site (approximately three miles to the north). In addition to Fire Station No. 82, Fire Station No. 19 located at 1729 Foothill Boulevard in LCF is located approximately 3.8 miles (northwest) from the Project site.

Sheriff

The Los Angeles County Sheriff's Department (LASD) is a law enforcement agency that serves Los Angeles County – an area totaling approximately 4,084 square miles with a population of almost 10

million people. LASD is the largest Sheriff's Department in the world, with approximately 18,000 employees. LASD provides general law enforcement services to 40 contract cities (include the City of La Cañada Flintridge [the "City"]), 90 unincorporated communities, 216 facilities, hospitals, and clinics located throughout the County, nine community colleges, Metro, and 47 Superior Courts. LASD also provides services such as laboratories and academy training to smaller law enforcement agencies within the County. The LASD station closest to the Project site is the Crescenta Valley station located at 4554 Briggs Avenue in the La Crescenta, approximately six miles northwest of the Project site.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

Appendix G of the CEQA Guidelines

According to Appendix G of the *CEQA Guidelines*, a project could have a significant environmental impact if the project would:

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

Project Impacts

Flintridge Sacred Heart Academy

Construction

Buildout of the Specific Plan would occur in phases over an anticipated 15-year period. Construction activities associated with each development project could require temporary lane closures in the vicinity of the Project site in order to move construction equipment to and from the Project site and to export soil from the site. However, prior to issuance of any grading permits by the City, the Project developer would be required to prepare a Construction Management Plan (for each development project) for review and approval by the City Engineer and County Fire Department. The Construction Management Plan would be required to address the following:

- Accommodating all parking related to construction on the Project site (i.e., no on-street parking) or at an approved off-site construction staging/employee parking area;
- Management of construction vehicles on local roadways, including the use of flagmen to assist with the management of construction vehicles on local residential roadways;

- Provisions for fire safety that include proper use and storage of combustible construction materials and equipment and establishment of appropriate brush clearance in active work areas; and
- Any additional fire and life safety requirements determined by the City and County Fire Department at the time of fire plan check.[2]

Through preparation and implementation of the Construction Management Plan and any additional fire and life-safety conditions imposed by the City and County, the temporary and intermittent construction activities associated with buildout of the Specific Plan would not require the need for new or altered fire or sheriff protection facilities. Therefore, the Project's construction-related impacts on fire and sheriff protection services would be less than significant.

Operation

Although buildout of the Specific Plan would expand building square footage on the campus, the Specific Plan does not include an increase in student enrollment or a substantial increase in the number of school events that do (and would continue to) occur at the campus. Thus, school activity under buildout of the Specific Plan would remain substantially similar to the existing school activity and would not increase the need for fire or sheriff protection services.

Additionally, the initial phase of the Specific Plan includes improving both the existing water delivery system to improve fire flow to meet current fire code and safety requirements and upgrading the existing electrical service system to accommodate the larger electrical load necessary to operate the pump system for required fire flow. Existing fire flow for the FSHA Campus is provided through a series of existing fire hydrants located in the public right-of-way along adjacent roadways and that tap into the existing 16-inch and 8-inch water lines in St. Katherine Drive, a 6-inch high pressure water line in Wendover Road as well as an existing 8-inch water line in Palmerstone Drive. As implementation of the Specific Plan occurs, fire-flow improvements would include implementation of a system of privately-installed water pumps and fire hydrants throughout the FSHA Campus to establish adequate fire-flow pressure and an internal distribution network for fire-flow within the FSHA Campus grounds. The fire service enhancements would be implemented prior to any increase in building square footage (above existing levels identified on Table III-1 in Section III [Project Description]), which cannot be accommodated by the existing water-service system.

Anticipated improvements include installation of a minimum of two fire pumps (to be located at the existing pump house west of the Student Activities Center) and placement of a minimum of four new fire hydrants throughout the FSHA Campus grounds. Location of the fire hydrants would be coordinated with

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[2] *County of Los Angeles Fire Department, Kevin T. Johnson, Acting Chief, Forestry Division, March 22, 2016. (Refer to Appendix H.)*

the County Fire Department to ensure that their placement meets criteria for access and building proximity. This fire service system would be privately supported and maintained by FSHA.

In addition, all new buildings and all major renovations would be fully sprinklered in accordance with current fire code.

The Conceptual Landscape Plan incorporates a plant palette of drought-tolerant and native species that serve to reduce water use and serve as a sufficient buffer between FSHA Campus development areas and surrounding native vegetation and brush. As required, the Landscape Plan and ongoing maintenance and operation of the FSHA Campus would be in compliance with the "Fuel Modification Plan Guidelines," published by the County Fire Department. To ensure compliance with fuel modification and setback planning requirements, the draft landscape plan prepared for each major FSHA Campus improvement would be reviewed and approved by the County Fire Department.

Emergency vehicle access the FSHA Campus buildings is currently provided primarily from St. Katherine Drive. The Administration Building is accessible directly from St. Katherine Drive, as is the current Parking Lot C (and future Parking Facility) across from the Administration Building. Other upper campus buildings are accessible from the main driveway leading to the Arts Center Building, High School Building and Student Activities Center. Cottages 1 through 6, which are built on the slope behind the Arts Center Building, are indirectly accessible from the upper campus lots, as well as the Lot C parking area. Also, FSHA maintains a Campus Emergency Response Plan for the coordination and/or evacuation of students, staff, and faculty in the event of a disaster or threat to life and property on Campus. The Emergency Response Plan, which is reviewed and revised periodically by FSHA, is available upon request (pending the privacy and protection of FSHA Campus safety) from FSHA.

As improvements within the upper campus are implemented under the Specific Plan, the drive aisle within Parking Lots D and F would be reconfigured and widened to 26 feet to accommodate emergency vehicles and providing the ability to turn around within the upper lot area.

The existing service access road that extends from the southeast corner of the High School Building counterclockwise to the north end of the building would be improved and widened to a finished width of 20 feet so as to accommodate emergency fire response vehicles. Implementation of the emergency access road would require that small sections of retaining walls be installed down slope of the existing road so that these areas may be backfilled and the roadway widened.

Final placement and sizing of the retaining walls for the emergency access road would be determined through recommendations of a Geotechnical Report and the final Grading Plan. The access road around the back of the High School Building would be designed so that retaining walls are limited to a maximum height of 15 feet in order to minimize visibility from surrounding properties.

Based on the information above, Project impacts related to fire and sheriff protection services would be less than significant.

Southern California Edison Sub-Transmission Pole/Line Replacement

Prior to implementation of the Specific Plan development projects, approximately eight existing 66-kV sub-transmission poles would be replaced, and approximately five new 66-kV sub-transmission poles would be installed. One existing H-Frame Structure located approximately 100 feet southeast of Highland Drive and approximately three existing 4-kV distribution poles located to the east of the FSHA Campus could be removed. Approximately four new 16-kV distribution poles would be installed – one at the intersection of Inverness Drive and St Katherine Drive and three north of the FSHA Campus. 16-kV underground facilities would be installed from the north side of the campus to the point of connection at the north side of the FSHA Campus.

Due to lack of accessibility as a result of topography and vegetation, replacement of approximately four of the 66-kV sub-transmission poles would require the use of a helicopter to transport the poles from a staging area to the location of the pole installation. The anticipated staging area would be the Palmerstone Property and the intersection of Inverness Drive and Normandy Drive. Preliminary field visits to the Palmerstone Property by SCE have indicated no alteration of the property likely would be required. If field conditions changed and the property needed to be prepped for helicopter operations, SCE would return the property to the conditions observed during the preliminary field visits or as agreed with FSHA. Once the area for the pole installation has been prepped, a helicopter would fly from its station of origin to the staging area, where the pole would be attached to lines and would be carried by the helicopter to the location of pole installation. It is possible that the poles would be installed in two pieces, requiring two helicopter trips per pole.

Access to the other pole locations would occur from adjacent roadways and public rights-of-way. The dirt access road (Monarch Road) between St. Katherine Drive and Bramley Way would need to be scraped/cleared of existing vegetation for vehicle access. The plan would be to remove overgrown vegetation, including obstructive tree branches. Monarch Road may also be used as a staging area for equipment and materials. For some of the pole installations and rewiring, temporary partial lane closures and/or roadway closures during daytime work hours (approximately from 7:00 am to 4:00 pm) would be required, including those listed below. It should be noted that some work restrictions, such as freeway closures and power outages, could require construction on weekends or outside of typical construction hours.

- 210 Freeway: Momentary/intermittent closure between Berkshire Place and the Foothill Freeway Overpass would be required for wire stringing operations across the freeway as required by the California Highway Patrol (CHP). SCE would coordinate with Caltrans and CHP for this operation to obtain permits necessary for traffic control and for stringing the new line across the freeway. Traffic on the freeway would be stopped by CHP between approximately exists 22A and 22B for approximately five minutes at a time over a duration of an hour during a time of low traffic volume (such as sunrise on a Sunday morning).

- Oak Grove Road at SCE wire crossing: Partial lane closure or roadway closure would be required for equipment and material storage. The closure could last up to three intermittent days within construction hours. During this timeframe, appropriate traffic control will be utilized to stop traffic-until the operations have been completed.

- Highland Avenue: Partial lane closure or roadway closure between Berkshire Avenue and the Foothills Freeway Overpass would be required to for foundation construction, pole installation, and wire stringing operations. The closure would occur during working hours and could occur over approximately 12 intermittent days. During this timeframe, appropriate traffic control would be implemented until the operations have been completed.

- Inverness Drive at St. Katherine Drive: Partial lane closure on or roadway closure would be required to for equipment and material storage. The closure would occur during working hours and could occur over approximately 12 intermittent days. During this timeframe, appropriate traffic control would be implemented until the operations have been completed.

- Inverness Drive at Normandy Drive: Partial lane or roadway closure of Inverness Drive for equipment, material storage, and helicopter staging. The closure could occur over approximately 12 intermittent days. During this timeframe, appropriate traffic control would be implemented until the operations have been completed.

- St. Katherine Drive and Monarch Road: Partial lane closure or roadway closure would be required for equipment and material storage. The closure could occur over approximately three intermittent days. During this timeframe, appropriate traffic control would be implemented until the operations have been completed.

- Inverness Drive south of Corona Drive: Partial lane or roadway closure would be required for equipment and material storage. The closure could occur over approximately three intermittent days. During this timeframe, appropriate traffic control would be implemented until the operations have been completed.

- Bramley Way and Monarch Road: Partial lane or roadway closure would be required for equipment and material storage. The closure could occur over approximately three intermittent days. During this timeframe, appropriate traffic control would be implemented until the operations have been completed.

Palmerstone Drive at dead-end north of campus: Partial lane or roadway closure would be required for equipment and material storage. The closure could occur over approximately six intermittent days. During this timeframe, appropriate traffic control would be implemented until the operations have been completed.

The pole replacement/installation process would take place over approximately two months. The sequence of pole replacement/installation is not known at this time and would be dependent on the contractor assigned to the job. SCE would be required to apply for and obtain an encroachment permit from the City, which would require SCE to prepare a Traffic Control Plan for review and approval by the City and the County Fire Department.[3] All activities would occur in accordance with traffic control measures imposed by the City and County Fire Department and published in the California Joint Utility Traffic Control Manual to ensure that emergency access to the Project area would not be substantially impaired. With the exception of minimal amounts of fuel for construction vehicles, no hazardous materials would be used as part of the pole/line replacement project. For these reasons, the pole/line replacement/installation project would not require the need for new or altered fire protection facilities. Therefore, impacts on fire or sheriff protection services as a result the pole/line replacement/installation project would be less than significant.

CUMULATIVE IMPACTS

As shown on Table II-3 in Section II (Environmental Setting), 10 related projects have been identified, including a church with an assisted living facility and 9 new single-family homes. Related Project 1 includes demolition of an existing 5,743-square-foot church and development of a new 2,300-square-foot church and a 58,600-square-foot assisted living facility. Each of the other 9 related projects that includes development of a new single-family home also includes demolition of an existing single-family home. As such, the church land use component of Related Project 1 and Related Projects 2 through 9 generally would not result in any net increase in the need for fire or sheriff protection services.

Cumulative development requires LACFD and LASD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the proposed Project, the related projects would be subject to the applicable regulations of the LFC Municipal Code including, but not limited to, compliance with building code standards, building inspections, setbacks from trees and shrubs, fuel modification requirements, use of fire-retardant landscaping, and ingress/egress, and other recommendations made by the LACFD and LASD to ensure fire and emergency protection safety. Through the process of compliance, the ability of the LACFD and LASD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LACFD and LASD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the proposed Project and related projects would contribute. As discussed previously, Project impacts related to fire and sheriff

[3] *SCE has a standard Traffic Control Plan that they typically implement for these types of projects. An example of this plan is included in Appendix F for informational purposes. It should be noted that the City and/or County could require specific changes and/or additions to the Traffic Control Plan to meet the specific needs of the proposed pole/line replacement/installation project.*

protection services would be less than significant. Therefore, cumulative impacts related to fire and sheriff protection services would be less than significant.

MITIGATION MEASURES

No significant impacts on fire or sheriff protection services have been identified, and no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts on fire and sheriff protection services would be less than significant.