3.5 Public Services

Public services include basic support systems necessary for a functioning community. This section describes existing and proposed school services and fire and law enforcement protection, and evaluates changes to the environment resulting from the provision of such services to the project. Information provided in this section is from the County of San Diego General Plan and related EIR (County of San Diego 2011a, 2011c–2011e), the Fire Protection Plans for Newland Sierra and Sierra Farms (EIR, Appendix N and Appendix O, respectively), and personal communications with school districts and other service providers. This section also references the following project facility available forms, included as Appendix EE of this EIR:

- San Diego County Sheriff's Department (Appendix EE-1)
- San Marcos Unified School District (Appendix EE-2)
- Escondido Union School District (Appendix EE-3)
- Escondido Union High School District (Appendix EE-4)
- Vallecitos Water District Water (Appendix EE-5)
- Vallecitos Water District Sewer (Appendix EE-6)

Lastly, a School District Analysis was completed by DPFG (Appendix FF) which summarizes their analysis of projected school fees and student generation in connection with the proposed project.

Effects associated with recreation services, such as parks, are evaluated in this EIR, Section 3.4, Parks and Recreation; effects associated with the capacity of the domestic water system to provide adequate fire protection is evaluated in this EIR, Section 2.14, Utilities and Service Systems; and impacts related to emergency access are analyzed in this EIR, Section 2.8, Hazards and Hazardous Materials, and Section 2.13, Transportation and Traffic.

Comments received in response to the Notice of Preparation (NOP) included concerns regarding increased fire hazards and emergency medical response times, increased demand on law enforcement, and the lack of adequate capacity at surrounding schools. These concerns are addressed and summarized in this section. A copy of the NOP and comment letters received in response to the NOP is included in Appendix A of this EIR.

3.5.1 Existing Conditions

Fire Protection

Within the unincorporated region's emergency services system, fire and emergency medical services are provided by the San Diego County Fire Authority, Fire Protection Districts, County Service

Areas (CSAs), and the California Department of Forestry and Fire Protection (CAL FIRE). Collectively, more than 2,800 firefighters are responsible for protecting the San Diego region from fire. Generally, each agency is responsible for structural and wildland fire protection within their area of responsibility. However, mutual and automatic aid agreements enable non-lead fire agencies to respond to fire emergencies outside their district boundaries (County of San Diego 2011a).

On June 25, 2008, the County Board of Supervisors approved a program to merge fire protection for the County of San Diego. Under this program, the County brought six volunteer fire companies under the San Diego County Fire Authority and exercised the County's latent powers to provide fire and emergency medical services within the subarea of CSA No. 135. This reorganization encompasses approximately 942,000 acres, which represents roughly 60 percent of the target area. The next step was to add CSA Nos. 109 (Mt. Laguna), 110 (Palomar Mountain), 111 (Boulevard), 112 (Campo), and 113 (San Pasqual) to CSA No. 135, resulting in service to approximately 1 million acres, or roughly 70 percent of the target area. Currently, the County has applied to LAFCO to expand CSA No. 135, concurrent with the dissolution of San Diego Rural and Pine Valley Fire Protection Districts. The San Diego Rural Fire Protection District has been dissolved, and the Pine Valley Fire Protection District is anticipated to be dissolved in 2017. The project is not located within any of the above service areas for fire and emergency medical services.

The project Site is located within the Deer Springs Fire Protection District (DSFPD). The DSFPD is located in north San Diego County, and it covers 47 square miles north of Escondido. Established in 1981, the DSFPD provides fire service through a contract with CAL FIRE, which provides staffing for the District. DSFPD currently operates three fire stations, all of which could respond to a fire or medical emergency at the proposed project (DSFPD 2015). Table 3.5-1 provides a summary of the DSFPD's fire and emergency medical delivery system. Additionally, a portion of the Site (Sierra Farms) is located within the jurisdiction of the San Marcos Fire Protection District (SMFPD), which is a full-service department responsive to the City of San Marcos and the unincorporated areas within the SMFPD. SMFPD operates four fire stations, and being that Stations 1 and 3 are closest, they would respond to an incident at the proposed project. In addition, the City has signed an automatic aid agreement on first alarm or greater fires with all surrounding communities.

The closest station is Fire Station 12, located at 1321 Deer Springs Road, which staffs a minimum of three firefighters 24 hours per day/7 days per week and houses one Type I Engine and a Type III engine. The existing Fire Station 12 is a mobile station and has been in place since 1980. Secondary response would be provided from other DSFPD fire stations as needed. Station 13 is the next closest DSFPD station and is located in the Hidden Meadows community at 10308 Meadow Glen Way East. The station staffs three firefighters on-duty, 24-hours per day and houses one Type I and one reserve Type I engine. Station 11, DSFPD's headquarters, is located at 8709 Circle R Drive and houses one Type I and one reserve Type I engine, and one private paramedic ambulance (DSFPD 2015).

The County contracts with CAL FIRE to provide wildland fire protection services within unincorporated areas of San Diego County. On average, CAL FIRE responds to more than 5,600 wildland fires each year statewide (CAL FIRE 2016).

There is a "closest unit boundary drop" in effect for several fire agencies in north San Diego County. Units dispatched by Northcom include North County Fire Protection District, Vista Fire Protection District, San Marcos Fire Protection District, Pala, Oceanside Fire Department, and Rancho Santa Fe Fire Protection District. Vehicles have automatic vehicle locators and CAL FIRE, through San Diego County Fire Authority funding, is being outfitted with automatic vehicle locators so that the dispatch center computer-aided design (CAD) system can locate and dispatch the closest units to the emergency. The dispatch center for the automatic aid units is Northcom. CAL FIRE Monte Vista dispatch center dispatches the CAL FIRE-operated DSFPD units. CAL FIRE dispatch center is the secondary public safety answering point. All 911 calls in DSFPD are routed to CAL FIRE first (DSFPD 2015).

Law Enforcement

The County Sheriff's Department provides law enforcement services to the unincorporated areas of San Diego County, including the proposed project. The Sheriff's Department has approximately 4,000 employees, 800 vehicles, and a fleet of helicopters, and operates eight major detention facilities, and provides security for 171 courtrooms and 10 courthouses throughout San Diego County (County of San Diego Sheriff's Department 2015a).

As San Diego County's Chief Law Enforcement Officer, the Sheriff also provides regional law enforcement services for the entire County. These services include investigation, aerial support, emergency planning and response, law enforcement training, and operation of six County detention facilities (County of San Diego Sheriff's Department 2015a).

The County Sheriff's San Marcos Station is closest to the proposed project, approximately 8 miles southwest. The County Sheriff's Department has provided contract law enforcement services to the City of San Marcos since its incorporation in 1963. The station has a total service area of over 100 square miles, which encompasses the City of San Marcos and the surrounding unincorporated areas of San Marcos and Escondido. The San Marcos station currently provides public safety services to a population of more than 111,000 residents. The patrol deputies are responsible for all general law enforcement calls for services, 24 hours per day, 365 days per year (San Diego County Sheriff's Department 2017).

Further, the Escondido Police and Fire Headquarters is located approximately 9 miles southeast of the proposed project at 1163 North Centre City Parkway, Escondido. The Escondido Police

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Department has 170 sworn police personnel and 69 non-sworn support personnel who provide a variety of services to the citizens of Escondido (Escondido Police Department 2015).

Calls are assigned a priority based on the nature of the incident and the level of urgency. Priority 1 is considered the highest priority and includes officer assistance and/or vehicular pursuit calls. Priority 2 calls include injured persons, robbery in progress, bomb threats, and stolen vehicles. Priority 3 calls include assaults, prowlers, disturbances, tampering with vehicles, and burglary alarms. Priority 4 calls are the lowest priority calls and include security checks, animal noise disturbances, traffic stops, harassing phone calls, illegal dumping, and abandoned vehicles. Response times are used as guidelines to measure adequate levels of service.

The Sheriff's Department has a goal of providing facilities to support a service level of four patrol shifts per day per a 10,000 population. The target response time for priority calls is 12 minutes or less and 24 minutes or less for non-priority calls (County of San Diego Sheriff's Department 2015a).

Schools

The proposed project is within the service boundaries of three public school districts: San Marcos Unified School District, Escondido Union School District, and Escondido Union High School District (see Figure 1-33, School District Boundaries). In addition, the proposed project has reserved a 6-acre site for a school. Implementation of the proposed project would generate new students within the three school districts. Schools around the proposed project include Reidy Creek Elementary School, Twin Oaks Elementary School, Richland Elementary School, Calvin Christian School, and Escondido High School. No schools are located within 1 mile of the proposed project.

Public Library Service

The County Library system serves more than 1 million residents in San Diego County's unincorporated communities. In 1996, the Board of Supervisors adopted recommended Standards of Library Service. Library branches are assigned to a particular category based on several factors including the size of branch location, the population served, and the volume of materials checked out. The minimum space service goal for the San Diego County Library system is 0.5 square feet per capita (County of San Diego 2011a). The closest public libraries to the proposed project are San Marcos Branch Library, Vista Public Library, Escondido Public Library, and Valley Center Branch Library.

Civic Facilities

No civic administrative facilities are located in the proposed project Site. The surrounding areas are currently served by the County, the City of San Marcos, and the City of San Diego.

The County's central civic administrative offices are located in the County Administrative Center located at 1600 Pacific Highway in downtown San Diego. The main County annex, including the Planning & Development Services Department, is located 5510 Overland Avenue, San Diego, California 92123. The County Courthouse and Hall of Justice are located on West Broadway in the City of San Diego. The division headquarters for the County's field operations is located in the Spring Valley area. That facility is supplemented by two small, adjacent operation centers and three additional stations located in Alpine, Campo, and Descanso.

3.5.2 Regulatory Setting

Federal Regulations

No federal policies concerning public services are applicable to the proposed project.

State Regulations

California Health and Safety Code

State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. As provided by Section 13104, the State Fire Marshal assists in the enforcement of all laws and regulations relating to fires and fire prevention and protection.

California Code of Regulations Title 24, Part 2 and Part 9

Part 2 of Title 24 of the California Code of Regulations refers to the California Building Code, which contains complete regulations and general construction building standards of state adopting agencies, including administrative, fire and life safety and field inspection provisions. Part 9 refers to the California Fire Code, which contains fire-safety-related building standards referenced in other parts of Title 24.

State Responsibility Area Fire Safe Regulations

The Department of Forestry Fire Protection regulations constitute the basic wildland fire protection standards of the California Board of Forestry. They were prepared and adopted for

establishing minimum wildfire protection standards in conjunction with building, construction, and development in State Responsibility Areas. Title 14, Natural Resources, requires the future design and construction of structures, subdivisions, and developments in a State Responsibility Area to provide basic emergency access and perimeter wildfire protection measures.

Findings for Approval of Subdivision Maps Located in Fire Hazard Areas

Pursuant to the provisions of California Government Code Section 66474.02, before approving a Tentative Map, or a parcel map for which a Tentative Map was not required, for a subdivision located in a State Responsibility Area or a high fire hazard severity zone, the decision maker must make the following findings:

- 1. The design and location of each lot in the subdivision, and the subdivision as a whole, are consistent with any applicable regulations adopted by the State Board of Forestry and Fire Protection pursuant to Sections 4290 and 4291 of the Public Resources Code.
- 2. Supported by substantial evidence in the record, structural fire protection and services will be available for the subdivision through any of the following entities:
 - a. A county, city, special district, political subdivision of the state, or another entity organized solely to provide fire protection services that is monitored and funded by a county or other public entity.
 - b. The Department of Forestry and Fire Protection by contract entered into pursuant to Section 4133, 4142, or 4144 of the Public Resources Code.
- 3. To the extent practicable, ingress and egress for the subdivision meets the regulations regarding road standards for fire equipment access adopted pursuant to Section 4290 of the Public Resources Code and any applicable local ordinance.

Senate Bill 50/California Government Code Section 65995

Senate Bill 50 (SB 50) was signed into law in 1998 (Government Code Section 65995) and imposes limitations on the power of cities and counties to require mitigation of school facilities' impacts as a condition of approving new development. It also authorizes school districts to levy statutory developer fees at a higher rate for residential development than previously allowed. Specifically, SB 50 amended Government Code Section 65995(a) to provide that only those fees expressly authorized by law (Education Code Section 17620 or Government Code Sections 65970 et seq.) may be levied or imposed in connection with or made conditions of any legislative or adjudicative act by a local agency involving planning, use, or development of real property.

Other relevant sections of the Government Code include the following:

 Section 65995(h), which declares that the payment of the development fees authorized by Education Code Section 17620 is "full and complete mitigation of the impacts of any legislative or adjudicative act...on the provision of adequate school facilities."

• Section 65995(i), which prohibits an agency from denying or refusing to approve a legislative or adjudicative act involving development "on the basis of a person's refusal to provide school facilities mitigation that exceeds the amounts authorized [by SB 50]."

Assembly Bill 16

In 2002, Assembly Bill 16 (AB 16) created the Critically Overcrowded School Facilities Program, which supplements the new construction provisions within the School Facilities Program. The School Facilities Program provides state funding assistance for two major types of facility construction projects: new construction and modernization. The Critically Overcrowded School Facilities Program allows school districts with critically overcrowded school facilities, as determined by the California Department of Education, to apply for new construction projects in advance of meeting all School Facilities Program new construction program requirements. Districts with School Facilities Program new construction eligibility and school sites included on a California Department of Education list of source schools may apply.

Local Level

County of San Diego General Plan

Public services are addressed in the County's General Plan Safety Element and Mobility Element, and, to a limited extent, the County's General Plan Land Use Element.

General Plan Safety Element

The General Plan Safety Element addressed police and fire protection goals and policies (County of San Diego 2011c). The San Diego County Sheriff is responsible for providing law enforcement services in the unincorporated County and to certain cities under contract. The General Plan Land Use Maps identify where future development will occur, which can be used by the Sheriff in conjunction with forecasts from contract cities, to prepare facility and service plans. Additionally, Crime Prevention Through Environmental Design (CPTED) is recognized as an effective planning tool to help minimize or deter criminal activity. CPTED consists of four complementary strategies including natural surveillance, access control, maintenance, and territorial reinforcement. CPTED does not eliminate crime within a neighborhood but it can dramatically reduce the likelihood of theft and other crimes (County of San Diego 2011c).

As to fire protection, the General Plan Safety Element includes acceptable travel time distances based on land use designations. During the past several years, the County instituted a number of safety-related programs and policies to reduce the risk of fire hazards. Select applicable General Plan Safety Element policies are listed below (County of San Diego 2011c):

- **GOAL S-3: Minimized Fire Hazards.** Minimize injury, loss of life, and damage to property resulting from structural or wildland fire hazards.
 - o **Policy S-3.4: Service Availability.** Plan for development where fire and emergency services are available or planned.
- GOAL S-6: Adequate Fire and Medical Services. Adequate levels of fire and emergency medical services (EMS) in the unincorporated County.
 - Policy S-6.1: Water Supply. Ensure that water supply systems for development are adequate to combat structural and wildland fires.
 - o **Policy S-6.2: Fire Protection for Multi-Story Development.** Coordinate with fire services providers to improve fire protection services for multi-story construction.
 - Policy S-6.3: Funding Fire Protection Services. Require development to contribute
 its fair share towards funding the provision of appropriate fire and emergency medical
 services as determined necessary to adequately serve the project.
 - Policy S-6.4: Fire Protection Services for Development. Require that development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station) of the General Plan.

Table S-1
Travel Time Standards from the Closest Fire Station*

Travel Time	Regional Category (and/or Land Use Designation)	Rationale for Travel Time Standards**		
5 Min	 Village (VR-2 to VR-30) and limited Semi-Rural Residential Areas (SR-0.5 and SR-1) Commercial and Industrial Designations in the Village Regional Category Development located within a Village Boundary 	In general, this travel time standard applies to the County's more intensely developed areas, where resident and business expectations for service are the highest.		
10 Min	 Semi-Rural Residential Areas (>SR-1 and SR-2 and SR-4) Commercial and Industrial Designations in the Village Semi-Regional Category Development located within a Rural Village Boundary 	In general, this travel time provides a moderate level of service in areas where lower-density development, longer access routes and longer distances make it difficult to achieve shorter travel times.		

Table S-1				
Travel Time Standards from the Closest Fire Station*				

Travel Time	Regional Category (and/or Land Use Designation)	Rationale for Travel Time Standards**
20 Min	 Limited Semi-Rural Residential areas (>SR-4, SR-10) and Rural Lands (RL-20) All Commercial and Industrial Designations in the Rural Lands Regional Category 	In general, this travel time is appropriate for very low density residential areas, where full-time fire service is limited and where long access routes make it impossible to achieve shorter travel times.
> 20 Min	Very-low rural land densities (RL-40 and RL-80)	Application of very-low rural densities mitigates the risk associated with wildfires by drastically reducing the number of people potentially exposed to this hazard. Future subdivisions at these densities are not required to meet a travel time standard. However, independent fire districts should impose additional mitigation requirements on development in these areas.

^{*} The most restrictive standard will apply when the density, regional category, and/or village/rural village boundary do not yield a consistent response time standard.

- O Policy S-6.5: Concurrency of Fire Protection Services. Ensure that fire protection staffing, facilities and equipment required to serve development are operating prior to, or in conjunction with, the development. Allow incremental growth to occur until a new facility can be supported by development.
- GOAL S-12: Adequate Law Enforcement Facilities. Timely development of law enforcement facilities in locations that serve the unincorporated areas of the County.
 - O Policy S-12.1: New Law Enforcement Facilities. Coordinate new law enforcement facilities and services with new development in ways that sustain the provision of comprehensive services at levels consistent with substantially similar areas of the County.
- GOAL S-13: Safe Communities. Law enforcement facilities and services that help maintain safe communities.
 - o **Policy S-13.1: Sheriff Facility Locations**. Locate Sheriff facilities to best serve existing and planned development and the corresponding demand for services.
 - O Policy S-13.2: Sheriff Facilities in Non-Residential Areas. Locate future Sheriff facilities in commercial, industrial, or mixed-use areas; they may also be located within residential areas when other sites are unavailable or unsuitable based on circulation, geography, proximity to demand, and other factors that impact the practical provision of services.

^{**} Travel time standards do not guarantee a specific level of service or response time from fire and emergency services. Level of service is determined by the funding and resources available to the responding entity.

- **GOAL S-14: Crime Prevention.** Crime prevention through building and site design.
 - o **Policy S-14.1: Vehicular Access to Development**. Require development to provide vehicular connections that reduce response times and facilitate access for law enforcement personnel, whenever feasible.
 - o **Policy S-14.2: Development Safety Techniques**. Require development within Village areas to utilize planning and design techniques, as appropriate, that deter crime.

Examples of design features include the following:

- Avoiding landscaping that might create blind spots or hiding places
- Centrally locating open green spaces and recreational uses so that they are visible from nearby homes and streets
- Designing streets to discourage cut-through or high-speed traffic
- Installing paving treatments, plantings, and architectural design features, such as columned gateways, to guide visitors to desired entrances and away from private areas
- Installing walkways in locations safe for pedestrians
- Designing lots, streets, and homes to encourage interaction between neighbors
- Including mixed land uses that increase activities on the street
- Siting and designing buildings oriented for occupants to view streets and public spaces
- Policy S-14.3: Crime Prevention. Coordinate with appropriate agencies and the community to reduce crime in all neighborhoods by improving communication and relationships with communities and through educational programs that address important safety issues.

General Plan Mobility Element

The County's General Plan Mobility Element contains policies regarding ingress, egress, and emergency vehicle accommodation within project sites. The following Mobility Element policy is applicable to public services (County of San Diego 2011d):

• Policy M-4.4: Accommodate Emergency Vehicles. Design and construct public and private roads to allow for necessary access for appropriately-sized fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents.

General Plan Land Use Element

The County's General Plan Land Use Element contains goals and policies regarding general location of land uses, public buildings, educational facilities, and other public facilities within project sites. The following policies and goals are relevant to the proposed project (County of San Diego 2011e):

- GOAL LU-9: Development of Community Cores. Well-defined, planned, and developed community cores, such as villages and town centers that contribute to a community's identity and character.
 - o **Policy LU-9.7: Town Center Planning and Design.** Encourage new school development in town centers and villages.
- GOAL LU-12: Infrastructure and Services Supporting Development. Adequate and sustainable infrastructure, public facilities, and essential services that meet community needs and are provided concurrent with growth and development.
 - O Policy LU-12.1: Concurrency of Infrastructure and Services with Development. Require the provision of infrastructure, facilities, and services needed by new development prior to that development, either directly or through fees. Where appropriate, the construction of infrastructure and facilities may be phased to coincide with project phasing.
 - o **Policy LU-12.2: Maintenance of Adequate Services.** Require development to mitigate significant impacts to existing levels of public facilities or services for existing residents and businesses. Provide improvements for Mobility Element roads in accordance with the Mobility Element Network Appendix matrices, which may result in ultimate build-out conditions that achieve an improved LOS [level of service] but do not achieve a LOS of D or better.
 - Policy LU-12.3: Infrastructure and Services Compatibility. Provide public facilities
 and services that are sensitive to the environment with characteristics of the
 unincorporated communities. Encourage the collocation of infrastructure facilities,
 where appropriate.
 - O Policy LU-12.4: Planning for Compatibility. Plan and site infrastructure for public utilities and public facilities in a manner compatible with community character, minimize visual and environmental impacts, and whenever feasible, locate any facilities and supporting infrastructure outside preserve areas. Require context sensitive Mobility Element road design that is compatible with community character and minimizes visual and environmental impacts; for Mobility Element roads identified in Table M-4, an LOS D or better may not be achieved.

 GOAL LU-17: Adequate Education. Quality schools that enhance our communities and mitigate for their impacts.

- Policy LU-17.2: Compatibility of Schools with Adjoining Uses. Encourage school
 districts to minimize conflicts between schools and adjacent land uses through
 appropriate siting and adequate mitigation, addressing such issues as student dropoff/pick up locations, parking access, and security.
- Policy LU-17.3: Priority School Locations. Encourage school districts to locate schools within Village or Rural Village areas wherever possible and site and design them in a manner that provides the maximum opportunity for students to walk or bicycle to school.
- GOAL LU-18: Adequate Civic Uses. Civic uses that enhance community centers and places.
 - O Policy LU-18.1: Compatibility of Civic Uses with Community Character. Locate and design Civic uses and services to [en]sure compatibility with the character of the community and adjoining uses, which pose limited adverse effects. Such uses may include libraries, meeting centers, and small swap meets, farmers markets, or other community gatherings.
 - O Policy LU-18.2: Co-Location of Civic Uses. Encourage the co-location of civic uses such as County library facilities, community centers, parks, and schools. To encourage access by all segments of the population, civic uses should be accessible by transit whenever possible.

3.5.3 Analysis of Project Effects and Determination as to Significance

Guidelines for the Determination of Significance

The County's Guidelines for Determining Significance do not include a section on Public Services. Therefore, for purposes of this EIR, Appendix G of the CEQA Guidelines (14 California Code of Regulations Section 15000 et seq.) applies to the direct, indirect and cumulative impact analyses. Accordingly, significant impact would result if:

- The project results 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 any of the public services:
 - Fire Protection

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- Law Enforcement
- Schools
- Other Public Facilities

The analysis of parks is included in Section 3.4, Parks and Recreation, of this EIR.

Analysis

Fire Protection

The proposed project is located within the jurisdictions of the DSFPD and the SMFPD. The majority of the proposed project is located within the DSFPD while the Sierra Farms portion (see Figures 1-3 and 1-17) is located within the SMFPD.

DSFPD provides fire service through a contract with CAL FIRE, which provides staffing for the District. DSFPD currently operates three Fire Stations, all of which could respond to a fire or medical emergency at the proposed project. The available firefighting and emergency medical resources in the vicinity of the proposed project include an assortment of fire apparatus and equipment considered fully capable of responding to the type of fires potentially occurring within and adjacent to the project Site.

The closest station is Fire Station 12, located at 1321 Deer Springs Road. The proposed project includes new homes and service level requirements. The proposed project is projected to roughly double Station 12's current call volume. The Fire Protection Plan (FPP) requirements are designed to aid firefighting personnel and minimize the demand placed on the existing emergency service system. Requirements of an FPP include analysis of topography; geology; flammable vegetation types; climate; description of water supply; location, width, and vertical clearance of fire access roads; fire protection systems; defensible space; vegetation management; and fire behavior computer modeling.

The proposed Sierra Farms portion (see Figures 1-3 and 1-17) is located within the jurisdiction of the SMFPD, which is a full-service department responsive to the City of San Marcos and the unincorporated areas within the SMFPD. SMFPD operates four fire stations. SMFPD Stations 1 and 3 are the closest SMFPD stations and would respond to an incident at the project Site. In addition, the City has signed an automatic aid agreement on first alarm or greater fires with all surrounding communities. As such, additional resources to Sierra Farms would also likely dispatch from the DSFPD Station 12, which is the closest station, located to the east along Deer Springs Road.

A GIS-based travel time coverage modeling effort was conducted to determine if the proposed project meets the General Plan's 5-minute travel time standard. A route analysis was also performed to determine the best route between a minimum of two points based on the parameters chosen. The analysis includes only response from Station 12 throughout the proposed project and surrounding areas where roads provide access. Modeling results indicate that Station 12 can reach the entire project Site within 5 minutes of travel, consistent with the General Plan Safety Element.

Initial fire response for the improved portions of the project Site would be provided by DSFPD's Station 12, due to its proximity that enable travel times within 5 minutes to all improved areas. In addition to Station 12, Stations 11 and 13 also can respond to the proposed project within 10 minutes to round out the effective firefighting force. Further, the San Marcos Fire Protection District, the Escondido Fire Department, and other North County fire agencies are parties to automatic aid or mutual aid agreements. These agreements provide additional resources during emergency conditions. Wildland areas adjacent to the proposed project are the responsibility of CAL FIRE due to their State Responsibility Area designation. DSFPD, along with other area agencies, respond simultaneously with CAL FIRE for wildland fires through a coordinated local agency response system.

Over the past 3 years, Station 12 has reported receiving between 487 (2012) and 518 (2014) calls per year, averaging between 1.33 and 1.42 calls per day, respectively. The most recent 3-year average call volume is 1.33 calls per day (DSFPD 2015).

The estimated incident call volume at build out of the proposed project is based on a conservatively calculated estimate from the maximum potential number of 6,600 persons. The calculated total of 6,600 people is an aggregate total, which combines all phases and all uses together and assumes they are all on the project Site at one time. The resident population would be 6,063 persons. However, to show the "worst-case" setting, call volumes use the potential maximum population. This includes 2,135 residential units multiplied by 2.97² persons per unit, along with commercial/retail, and all other land uses. When calculated based on square footage and California Fire Code occupancy standards and averaged over 7 days per week, the average population is slightly higher at approximately 6,600 (Appendix N).

San Diego County Fire Authority uses an estimate of 82 annual calls per 1,000 population based on the number of annual calls divided by the population times 1,000. The DSFPD's per capita call generation is 1,609 average annual calls divided by 13,000 persons = 0.124 calls per person x 1,000 = 124 calls per 1,000 persons, significantly higher than the County average. This is estimated to be due to the calls related to the large older adult population and

The Project Facility Availability Form (Appendix E to the Fire Protection Plan) provided by the DSFPD Fire Chief provides Fire Department input regarding travel time.

² 2.97 persons per unit has conservatively been used in the FPP for planning purposes.

incidents related to Interstate 15. As a conservative approach, the FPP uses DSFPD's current call volume to calculate the proposed project's projected call generation. The proposed project's estimated 6,600 maximum residents and visitors/guests would generate up to 818.4 calls per year (roughly 2.2 calls per day), 85 percent of which (695 per year) are expected to be medical-related calls (Appendix N).

Medical calls are the largest component of the DSFPD's call volume, and reflects the DSFPD's population, 30 percent of which is in the "over 65" age bracket. Typical fire departments, especially urban departments' call volumes, includes 80 percent or more medical-related responses. Residents over the age 65 collectively use more than two times more emergency medical service compared to younger populations, and those older than 85 collectively use more than three times more emergency medical services (Appendix N).

Overall, the proposed project would increase demand on fire and emergency medical services. The County Fire Mitigation Fee Program (see County Code of Regulatory Ordinances section 810.309 and Ord. No. 10429 (N.S.), June 21, 2016) ensures that development fees are paid at the time of issuance of building permits, and those fees are intended to closely reflect the actual or anticipated costs of additional fire protection facilities and equipment required to adequately serve new development. The DSFPD is a participant in the County's Fire Mitigation Fee Program.

The proposed project will pre-pay the County Fire Mitigation Fee pursuant to a Fire Fee Payment Agreement with the DSFPD which would also provide funding beyond the required County Fire Mitigation Fee to augment the DSFPD's capabilities for continued provision of timely service to its primary jurisdictional area, including the project Site. By pre-paying the County Fire Mitigation Fee, the proposed project ensures Fire Station 12 would continue to have the capacity and facilities to serve the project Site and satisfy the General Plan's 5-minute threshold (Appendix N). The final funding amount will be determined in the Fire Fee Payment Agreement, to be completed prior to map recordation per County conditions of approval. The proposed project would be in compliance with applicable portions of the San Diego County Consolidated Fire Code and the Deer Springs Fire Protection District's Ordinance No. 2013-01. The proposed project also would be consistent with the 2013 California Building Code, Chapter 7A, 2013 California Fire Code, Chapter 49, as adopted by San Diego County. Impacts associated with the degradation of fire protection services and facilities would be **less than significant**.

Law Enforcement

The San Diego County Sheriff's San Marcos Station is closest to the project Site, approximately 8 miles southwest. The existing facility within the command area is 18,530 square feet. The San Diego County Sheriff's Department has provided contract law enforcement services to the City of San Marcos since its incorporation in 1963. The station has a total service area of more than

100 square miles, which encompasses the City of San Marcos and the surrounding unincorporated areas of San Marcos and Escondido. The San Marcos Station currently provides public safety services to a population of more than 111,000 residents (County of San Diego Sheriff's Department 2017).

The proposed project would be subject to payment of public facilities development impact fees at the rate in effect at the time building permits are issued. The amount is determined through evaluation of the need for new law enforcement facilities as it relates to the level of service demanded by new development, which varies in proportion to the equivalent dwelling unit generated by a specific land use. The development impact fees address the proposed project's proportional impact on capital facilities, such as structures and equipment, associated with police protection. It does not address the impact associated with operations and maintenance for those facilities. Public funds such as property taxes, sales taxes, and fees generated by the project would be used to cover the incremental costs associated with providing police services. Net revenues are used to finance costs associated with operations and maintenance associated with the public services required to serve the project. The project would be required to pay the development impacts fees, which would be used exclusively for future facility improvements necessary to ensure that the development contributes its fair share of the cost of law enforcement facilities and equipment determined to be necessary to adequately accommodate new development in the County.

The project and its increase in population will necessitate an increase in law enforcement to meet the additional demands for services that invariably accompany population growth. The project would result in the need for five additional sworn personnel. For purposes of this analysis, the estimated residential population for the proposed project is approximately 6,063 individuals, resulting in the need for five new sworn officers to meet desirable law enforcement service levels (See EIR, Appendix EE, Project Facility Availability Forms). The project would not require the expansion of existing police protection facilities or the construction of new facilities. As such, the project would not result in impacts associated with the provision of new or physically altered facilities.

General Plan Policy LU-12.2 requires development to mitigate significant impacts to existing service levels. To ensure that adequate law enforcement protection is provided, future property owners would support the County's Sheriff Department through property tax payments, similar to all other County residents.

With incorporation of the project design features and the requirement for the proposed project to pay its fair share for increased law enforcement services via property taxes, the potential impact to law enforcement services would be **less than significant**.

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Schools

The proposed project is within the service boundaries of three public school districts: San Marcos Unified School District, Escondido Union School District, and Escondido Union High School District (see Figure 1-33, School District Boundaries). In addition, the project has reserved a 6-acre site for a school. Implementation of the proposed project would generate new students in each school district. While the proposed school on the reserved school site is being built, students generated by the proposed project would attend one of the local facilities depending on which district they reside. Students living within Escondido Union School District would attend Reidy Creek Elementary School, Rincon Middle School, and Escondido High School. Students living in the San Marcos Unified School District would attend Twin Oaks Elementary School, Woodland Park Middle School, and Mission Hills High School.

The proposed project would generate the following number of students, whom would attend a school in the San Marcos Unified School District: 317 K–5th grade students, 85 6th–8th grade students, and 98 9th–12th grade students. In addition, the proposed project would generate the following number of students, whom would attend a school in the Escondido Union School District: 132 K–5th grade students, 45 6th–8th grade students, and students whom would attend in the Escondido Union High School District: 119 9th–12th grade students. Combined, the project would generate approximately 449 K–5th grade students, 130 6th–8th grade students, and 217 9th–12th grade students (see EIR, Table 3.5-2 for a breakdown of these numbers).

The City of San Marcos analyzed impacts to school facilities within its boundaries when it approved an update to its General Plan (2011). The certified EIR (State Clearing House No. 2011071028) prepared in support of the General Plan Update to the San Marcos General Plan determined that the San Marcos School District would collect fees pursuant to SB 50/Government Code section 65995 from development to fund construction of new schools and that those fees would offset the cost to the San Marcos School District of providing education facilities to future students. (City of San Marcos 2011.) The EIR found that payment of the fees to the San Marcos School District would reduce impacts to school facilities to a less-than-significant level.³ (City of San Marcos 2011.)

Similarly, the City of Escondido analyzed impacts to school facilities within its boundaries when it approved an update to its General Plan (2012). The certified EIR (State Clearing House No. 2010071064) prepared in support of the General Plan Update to the Escondido General Plan determined that the Escondido Union School District and Escondido Union High School District

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The City of San Marcos General Plan Update EIR Section 3.14, Public Services, for its General Plan Update is incorporated by reference and available for public review and inspection upon request to the County of San Diego, Department of Planning and Development Services.

would maintain acceptable service levels so long as: (i) the School Districts collected fees pursuant to SB 50/Government Code section 65995 from development to fund construction of new schools; and, (ii) adhered to General Plan Update policies intended to reduce impacts associated with provision of school facilities. (City of Escondido 2012.) The EIR found that implementation of these measures would result in less-than-significant impacts related to school facilities. (Escondido General Plan Update EIR 2012.)

The Escondido Union High School District provided a signed Project Facility Availability Form in January 2015 (Appendix EE), which indicated that overcrowding would not occur at Escondido High School as a result of the proposed project (County of San Diego 2015a). The Project Facility Availability Form received by the Escondido Union School District did not indicate that overcrowding would occur at the elementary and middle school; however, the letter attached to the Project Facilities Availability Form goes on to state that schools may exceed capacity due to new student growth as a result of the proposed project and it cannot be known at this time if the boundaries will, or will not, change in the future to meet changing student demand (Appendix EE). According to the Project Facility Availability Form from the San Marcos Unified School District, it indicated that overcrowding would occur at the elementary, middle, and high school (Appendix EE).

After the on-site school is built, K-8 students generated by the proposed project would have the opportunity to attend this new school, which would have adequate capacity and would provide relief to overcrowding in the San Marcos Unified School District. Even with the addition of a school on-site, the project would be subject to assessment of applicable school fees in all three districts at the appropriate rate. Although existing schools in San Marcos are over capacity, the school districts' practice is to use relocatable classrooms or bussing to schools with capacity to temporarily house the additional students until such time as a new facility opens.

In recognition of the impact on school facilities created by new development, the school districts and the development may enter into various mitigation agreements to ensure the timely construction of school facilities to house students from new residential development. The primary financing mechanism authorized in these mitigation agreements is the formation of a community facilities district, pursuant to the Mello-Roos Community Facilities District Act of 1982.

In lieu of a mitigation agreement, the proposed project would be required to pay state-mandated school facilities fees to each school district to contribute a fair-share amount to help maintain adequate school facilities and levels of service. Regulatory compliance ensures that there would be sufficient facilities to serve the proposed project's additional students. Ultimately, the

The City of Escondido General Plan Update EIR Section 4.14, Public Services, for its General Plan Update is incorporated by reference and available for public review and inspection upon request to the County of San Diego, Department of Planning and Development Services.

provision of schools is the responsibility of the school districts. SB 50 provides that the statutory fees found in the Government and Education Codes are the exclusive means of considering and mitigating for school impacts. Imposition of the statutory fees constitutes full and complete mitigation (Government Code Section 65995(b)).

The proposed project would either pay the state-mandated school fees or enter into a School Mitigation Agreement(s) to ensure that schools are built as population increases during the phased development. Therefore, impacts related to school facilities would be **less than significant**.

Public Library Service

At buildout, the proposed project would result in an incremental increase in the local demand for library facilities. The closest public libraries to the proposed project are San Marcos Branch Library, 5.1 miles to the southwest; Vista Public Library, 7.4 miles to the west; Escondido Public Library, 7.4 miles to the south; and Valley Center Branch Library, 16.3 miles to the east. Future residences generated by the proposed project would use one of the four closest libraries. The proposed project does not specifically include development of a library, and both the San Diego County Library system, and the San Diego County Department of General Services, do not currently contemplate building or expanding a library in the vicinity of the proposed project Site (San Diego County Library, 2017; San Diego County Department of General Services, 2017). Therefore, construction or expansion of existing library facilities would not be required. Additionally, existing County policies and regulations ensure the ongoing provision of library facilities, the expansion of which would be subject to separate environmental review. As no new or expanded public library facilities would be required, public library facility impacts would be less than significant.

The I-15 interchange improvements, which constitute an off-site mitigation measure for the project, will not cause significant public services impacts, as they will not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for any of the above-described public services; thus, no analysis of potential impacts is necessary. Impacts would be **less than significant**.

3.5.4 Consistency with Applicable Plans, Policies, and Ordinances

The proposed project is consistent with Goal S-3 and Policy S-3.4. An FPP has been prepared for the proposed project, which evaluates and identifies the potential fire risk associated with the proposed project's land uses, and identifies requirements for water supply, fuel modification and defensible space, emergency access, building ignition and fire resistance, fire protection systems, and wildfire emergency pre-planning, among other pertinent fire protection criteria. The purpose

of the FPP is to generate and memorialize the fire safety requirements of the DSFPD, along with project-specific measures based on the Site, its intended use, and its fire environment.

The proposed project is consistent with Goals S-6, and Policies 6.1, 6.2, 6.3, 6.4, and 6.5. Water availability and flow will be consistent with DSFPD requirements, including fire flow and hydrant distribution. These features, along with the ignition resistance of all buildings, the interior sprinklers, and the pre-planning training and awareness will assist responding firefighters through prevention, protection, and suppression capabilities. Through the implementation of a Fire Fee Payment Agreement with the DSFPD, the project will provide funding beyond the required County Fire Mitigation Fee that will augment the DSFPD's capabilities for continued provision of timely service to its primary jurisdictional area, including the project Site. Fire Station 12 would continue to have the capacity and facilities to serve the project Site and satisfy the General Plan's 5-minute threshold (Appendix N). Compliance with the County Fire Mitigation Fee Program coupled with the additional funding in the Fire Fee Payment Agreement is consistent with the above goals and policies of the County.

The proposed project is consistent with Goals S-12, S-13 and Policies S-12.1, S-13.1, and S-13.2. This development and its increase in population will necessitate an increase in law enforcement to meet the additional demands for services that invariably accompany population growth. The project would result in the need for five additional sworn personnel. The project does not propose construction of new law enforcement facilities; however, the project would be required to pay a fair share contribution, which would be used, in combination with fees collected from other surrounding developments, to ensure adequate facilities and equipment are provided to local law enforcement. The development impact fees address the project's proportional impact on capital facilities, such as structures and equipment, associated with police protection. The amount is determined through evaluation of the need for new law enforcement facilities as it relates to the level of service demanded by new development, which varies in proportion to the equivalent dwelling unit generated by a specific land use.

The proposed project is consistent with Goal S-14 and Policies S-14.1, S-14.2, and S-14.3. Buildings are encouraged to be clustered to create high-traffic areas and incorporate 360 degree architecture for visibility. Primary access to the Community would be provided by Mesa Rock Road and Sarver Lane via Deer Springs Road, which connects to Interstate 15 to the east of the Community. The proposed circulation plan for the Community includes both on- and off-site road improvements. Secondary access would be provided via Camino Mayor, which connects to Twin Oaks Valley Road. As stated in the Specific Plan, visibility and safety should be promoted using principles of CPTED, which is based on proper design and effective use of buildings and public spaces in neighborhoods that can lead to reduction in fear and incidence of crime, and an improvement in the quality of life of residents.

The proposed project is consistent with Policy M-14.4. Due to the terrain and topography on the project Site, special attention was paid to locate neighborhoods and structures such that the likelihood of wildfire spread and encroachment would be minimized. An additional access road (Camino Mayor) is proposed to provide residents and emergency access vehicles with sufficient access to the project Site. The entire project Site has been designed with fire protection as a key objective. The improvements are designed to facilitate emergency apparatus and personnel access throughout the Site. Driveway and road improvements with fire engine turnouts and turnarounds provide access to within 150 feet of all sides of every building. These improvements are designed to facilitate emergency apparatus and personnel access throughout the Site.

The proposed project is consistent with Goal LU-9, Goal LU-17, Policy LU-9.7, Policy LU-17.2, and Policy LU-17.3. The Town Center would include commercial retail space, townhomes, and a school site. The Town Center would be designated Village Core Mixed Use (C-5) on the Twin Oaks Community Plan and zoned with the General Commercial/Residential (C34) Use Regulation. The Town Center would provide employment opportunities for future residents and for the surrounding area. The Town Center would be compact and walkable, as well as visually appealing and compatible with surrounding regional character. The 6-acre school site would serve the educational needs of the residents of the Community and surrounding areas. Consistent with the County's Community Development Model, the densest neighborhood on the Site, the Town Center, would consist of a range of commercial uses that are supported by a dense network of local roads containing bicycle lanes and walkways linking the neighborhoods with parks, a proposed school site, and public areas. In addition, the school site would include a joint-use field open to the public during weekends and after school hours during weekdays. The Town Center would be compact and walkable, as well as visually appealing and compatible with surrounding development. The Town Center would be accessible by those in the surrounding area due to its location, reinforcing the local vitality and economy of the Community.

The proposed project is consistent with Goal LU-12 and Policies LU-12.1, LU-12.2, LU-12.3, and LU-12.4. Infrastructure, public facilities, and essential services will be adequately sized and provided with the development of the planned Community. The infrastructure, public facilities, and essential services needed for the Community would be provided prior to development or phased to coincide with development. The proposed project would pay all required public facility impact fees as set forth in the County Code of Regulatory Ordinances. The project's off-site roadway improvements on public roads are included in project design. The project would also participate in the County's Traffic Impact Fee program, as necessary. The paid fees and roadway improvements would ensure that impacts to public facilities and Mobility Element Roadways are minimized to the extent feasible. The project is well located to take advantage of existing and planned infrastructure and services in an efficient manner, and will require less extensive infrastructure and services than if the project were sited outside of service district boundaries.

The proposed project is consistent with Goal LU-18 and Policies LU-18.1 and LU-18.2 by providing civic uses which enhance community places. A park and school site have been colocated within the Town Center, and a shuttle system is anticipated to provide transit opportunities to this planning area. The Town Center would be accessible by those in the surrounding area due to its location, reinforcing the local vitality and economy of the Community. Village Green Park and Oak Grove Park are located in the Town Center. Village Green Park would be designed to be accessible from the adjacent businesses and provide a gathering space and amenities designed to provide a space large enough for group picnics, neighborhood movies, informal play, and community events. In addition, one of the site design guidelines includes clustering retail buildings where practical, and incorporating plazas and pedestrian gathering areas within the clusters (Appendix C, Section 3.5.1).

The proposed project is consistent with the goals and policies identified throughout this section. For additional detail, see Section 3.3, Land Use.

3.5.5 Cumulative Impact Analysis

Fire Protection

Future growth in the cumulative area would generate additional demand on fire protection services, and require the construction or expansion of services and facilities to maintain acceptable travel times and adequate levels of service. As required by the General Plan for each jurisdiction where cumulative projects reside, each cumulative project would be required to ensure adequate availability for fire service and that travel times are met. If a project results in potential impacts on fire service or travel times, each project would be required to mitigate such impacts. In addition, each cumulative project would be required to demonstrate compliance with all applicable laws and regulations regarding fire protection services and facilities. Therefore, impacts to fire protection services or facilities would not be cumulatively considerable. Impacts would be **less than significant**.

Law Enforcement

Development of the proposed project would result in an incremental increase in demand on law enforcement services and, when combined with the demand associated with anticipated population growth and other potential cumulative development projects within the proposed project Site, additional police personnel, support staff, and related equipment and facilities would be required to effectively meet the demands of the proposed development and anticipated future development in the surrounding area. Payment of the required development impact fees would be required by the proposed project and all other cumulative projects. The development impact fees address a project's proportional impact on capital facilities, such as structures and equipment,

associated with police protection. Public funds such as property taxes, sales taxes, and fees generated by the cumulative projects would be used to cover the incremental costs associated with providing police services.

As noted above, the proposed project would not require construction of any additional law enforcement facilities at this time. Future growth in the cumulative area would generate additional demand for law enforcement protection to maintain acceptable response times and adequate levels of service. The cumulative increase in demand for law enforcement could result in the expansion of existing, or the construction of new facilities, which could have adverse impacts on the environment; however, all new or expanded facilities would be required to undergo environmental review and be required to demonstrate compliance with the General Plan. As stated above, the proposed project's financial contribution to the County's public facilities through taxes accumulated from future residents would contribute to the future expansion or construction of new facilities to maintain adequate levels of service. Therefore, because the expansion of existing or the construction of new facilities would be required to undergo CEQA review, and because the project would contribute its fair share financial contribution through ongoing tax assessments to maintain adequate levels of service, impacts to police protection services or facilities would not be cumulatively considerable. Impacts would be **less than significant**.

Public Schools

Cumulative projects that involve residential development would increase the public school population in the cumulative project area. The increase in demand for school facilities could result in the expansion of existing, or the construction of new facilities, which could have adverse impacts on the environment; however, all new or expanded facilities would be required to undergo environmental review and be required to demonstrate compliance with the General Plan. The proposed project would be subject to assessment of applicable school fees at the rate in effect at the time a Certificate of Compliance is issued; therefore, the proposed project would not result in a cumulatively considerable contribution to the additional demand on existing school facilities within the districts, nor result in a significant cumulative impact. Impacts would be **less than significant**.

Public Libraries

Population inducing projects would generate the need for additional public libraries or increased square footages at existing public libraries; however, the San Diego County Library has no plans to expand an existing library or to construct a new library to service the proposed project. In the future, if new or expanded libraries are proposed, they would be subject to the same environmental review procedures as all other development projects. Any identified significant impacts would be required to be mitigated to the extent feasible. Therefore, the proposed project in combination with cumulative projects, would not be cumulatively considerable and impacts would be **less than significant**.

3.5.6 Significance of Impacts Prior to Mitigation

Impacts to fire protection services, law enforcement, schools, and public libraries would be less than significant.

3.5.7 Mitigation Measures

No mitigation measures are required.

3.5.8 Conclusion

Impacts to fire protection services, law enforcement, schools, and public libraries would be less than significant. No mitigation measures are required.

Table 3.5-1
Deer Springs Fire Protection District Fire and Emergency Medical Delivery System

Fire Station No.	Address	Staffing	Apparatus
11 (Headquarters)	8709 Circle R Drive Escondido, California 92026 760.749.8001	Three, with one medic; plus two private medics on the ambulance	One Type I and one Reserve Type I engine, and one medic ambulance
12	1321 Deer Springs Road Escondido, California 92069 760.741.5512	Three, with one medic	One Type I and one Type III engine
13	10308 Meadow Glen Way West Escondido, California 92026 760.751.0820	Three, with one medic	One Type I and one Reserve Type I engine

Table 3.5-2 Student Generation for the Proposed Project

		Student Generation Rate		Students Generated			
	Units	Elementary School	Middle School	High School	Elementary School	Middle School	High School
San Marcos School District							
Single-Family	733	0.3605	0.0901	0.0986	265	67	73
Single-Family Attached / Multi- Family Attached	316	0.1617	0.0561	0.0776	52	18	25
Subtotal	1049	_	_	_	317	85	98
Escondido Union School District / Escondido Union High School District							
Single-Family	220	0.2949	0.0832	0.1365	65	19	31
Single-Family Attached / Multi- Family Attached	541	0.1235	0.0466	0.1617	67	26	88
Subtotal	761	_	_	_	132	45	119

Sources: SMUSD 2016; EUSD 2016; EUHSD 2016

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