

5. Environmental Analysis

5.15 PUBLIC SERVICES

This section addresses the proposed project's impacts to public services providing fire protection and emergency services, police protection, school services, and library services. Park services are addressed in Section 5.16, *Recreation*. Public and private utilities and service systems, including water, wastewater, and solid waste services and systems, are addressed in Section 5.19, *Utilities and Service Systems*.

5.15.1 Fire Protection and Emergency Services

5.15.1.1 ENVIRONMENTAL SETTING

Regulatory Background

International Fire Code

The International Fire Code (IFC) is a model code for regulating minimum fire-safety requirements for new and existing buildings, facilities, storage, and processes. The IFC includes general and specialized technical fire- and life-safety regulations, with topics addressing fire-department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, use and storage of hazardous materials, protection of emergency responders, industrial processes, and various other topics. The IFC is issued by the International Code Council, which is an international organization of building officials.

State

California Fire Code

The California Fire Code (CFC; California Code of Regulations, Title 24, Part 9) is based on the 2018 IFC and includes amendments from the State of California fully integrated into the code. The CFC contains fire-safety-related building standards that are referenced in other parts of Title 24 of the California Code of Regulations. The CFC is updated once every three years; the 2019 CFC took effect on January 1, 2020.

California Health and Safety Code

Sections 13000 et seq. of the California Health and Safety Code include fire regulations for building standards (also 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.

Local

City of Brea Municipal Code

Section 16.01.010, Fire Code Adopted, of Brea's fire code (municipal code chapter 16.04) states that the 2019 edition of the CFC in its entirety, together with the amendments, additions, deletions, and exceptions in Chapter 16.04, are the adopted fire code of the City.

City of Brea General Plan

The Brea General Plan policies support the City's fire and police services.

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- **Policy PS-1.2.** Provide up-to-date technology to the Brea Police and Fire Department.
- **Policy PS-1.4.** Work with the Fire Department to determine and meet community needs for fire protection and related emergency services. Ensure that sufficient stations, personnel, and equipment are provided to meet growth needs in the City.
- **Policy PS-1.5.** Maintain a maximum 4- to 6-minute emergency response time for fire safety services. Maintain a 3- to 5-minute response time from emergency police response services. Require that all new development be able to meet established standards for such response.
- **Policy PS-1.6.** Impose special conditions as needed on development projects to ensure that adequate fire protection measures are in place and maintained.

Existing Conditions

Fire Stations, Equipment, Staffing, and Mutual Aid

The Brea Fire Department serves the city of Brea and is the primary fire department providing service to the project site. The Los Angeles County Fire Department, Fullerton Fire Department, Orange County Fire Authority, and Placentia Fire and Life Safety Department provide mutual aid. Table 5.15-1, *Fire Stations and Equipment Serving the Project Area*, lists fire stations that respond to service requests in the project vicinity.

Table 5.15-1 Fire Stations and Equipment Serving the Project Area

Station	Address	Equipment
City of Brea Fire Department		
Brea Fire Department – Station #1	555 North Berry Street, Brea	Type 1 – Advanced Life Support, 4 personnel
Brea Fire Department – Station #2	200 North Brea Boulevard, Brea	Pierce/tiller – Advanced Life Support (ALS), 4 personnel, Cross Staffed Type 3
Brea Fire Department – Station #3	2600 E. Santa Fe Rd, Brea, CA 92821	Four person ALS engine company - ATV
Brea Fire Department – Station #4	198 N Olinda Place, Brea, CA 92823	Type 3 2 person BLS
Source: Nigg and Salgado 2020.		

Metro Cities Fire Authority

Metro Cities Fire Authority, also known as Metro Net Fire Dispatch (Metro Net), is an emergency communications center in Orange County. Metro Net Fire Dispatch provides 911 fire and EMS dispatch services to more than 1.3 million people in an area of approximately 210 square miles. Under a joint-powers authority agreement, Metro Net Fire Dispatch serves the cities of Anaheim, Brea, Fountain Valley, Fullerton, Garden Grove, Huntington Beach, Newport Beach, and Orange.

In 2018, 122,616 calls were dispatched, and approximately 83 percent of the calls dispatched were medical in nature.

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Response Times

Performance objectives for the Brea Fire Department are based on the National Fire Protection Association's Standard 1710.

■ **Firefighter Turnout Time**

- Medical Calls: To put on the appropriate gear and get on the fire apparatus for a medical call, crews have 60 seconds from time of dispatch.
- Fire/Traffic Accidents: To put on the appropriate gear and get on the fire apparatus for a fire or traffic accident, crews have 80 seconds from time of dispatch.

■ **First Fire Apparatus to Arrive on Scene**

- From the time the first fire apparatus leaves the station until it arrives at the given location, crews have 240 seconds or 4 minutes.

■ **Initial Full Alarm to Arrive on Scene**

- For a multiunit response such as a house fire, 1 battalion chief, 3 fire engines, and 1 ladder truck will be dispatched. The time for these emergency resources to arrive on scene is 480 seconds or 8 minutes.

The average monthly turnout/arrival time from January 2019 to April 2019 ranged from 4 minutes 47 seconds to 5 minutes 04 seconds. This an improvement over the same time a year ago, that is, January 2018 to April 2018, when it ranged from 4 minutes 58 seconds to 5 minutes 24 seconds. These times do not include the project site because the project site is currently not generating any emergency response calls.

Development Impact Fees

Dispatch Impact Fees

The City of Brea established these fees as necessary for upgrading police- and fire-dispatch systems, thus ensuring that new development is provided with appropriate public safety services (Brea 2018a).

- Multifamily: \$40/dwelling unit
- Single family: \$55/dwelling unit
- Commercial: \$55/1,000 square foot
- Office: \$77/1,000 square foot
- Industrial: \$40/1,000 square foot.

Fire Impact Fees

The purpose of the fire impact fee is to ensure that new development finances its fair share of fire protection facilities (Brea 2018a).

- Multifamily: \$731/dwelling unit

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- Single family: \$1,029/dwelling unit
- Commercial: \$191/1,000 square foot
- Office: \$267/1,000 square foot
- Industrial \$138/1,000 square foot

Fire Service Fees

Fire service connection charges are applicable to all new construction where fire service is to be installed (Brea 2018a). Fire service connection fees are buy-ins used to recover the cost of existing reservoir storage and water system capacity for private fire systems. The connection fees for fire service are:

- 4-inch connection: \$3,562
- 6-inch connection: \$ 4,987
- 8-inch connection: \$6,484
- 10-inch connection: \$9,337
- 12-inch connection: \$9,337

Wildfire Hazard Zones

The incorporated part of the project site is in the City of Brea's local responsibility area (LRA) as a very high fire hazard severity zone (FHSZ); the area in the city's sphere of influence is in the Orange County Fire Authority's unincorporated LRA as a very high FHSZ (CAL FIRE 2011; Brea 2001). (See also Section 5.20, *Wildfire*.)

5.15.1.2 THRESHOLDS OF SIGNIFICANCE

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

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

5.15.1.3 PLANS, PROGRAMS, AND POLICIES

Regulatory Requirements

- PPP PS-1 New buildings are required to meet the fire regulations outlined in California Health and Safety Code (Sections 13000 et seq.).
- PPP PS-2 The project applicant is required to pay applicable development impact fees (e.g., dispatch impact fees, fire impact fees, fire service fees) or in-lieu fees as stipulated by the approved Development Agreement.

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PPP PS-3 All development associated with the Brea 265 Specific Plan will be designed, built, and operated in accordance with the City of Brea’s Municipal Code Chapter 15.08, Building Code, and Chapter 16.04, Brea Fire Code.

Conditions of Approval

PPP PS-4 As part of the project review process, the City of Brea Fire Department will require approval of Building Plan Check for Site Plan and Emergency Access. Additional design features to address the City of Brea Fire Department’s requirements will be incorporated as conditions of approval for the Brea 265 Specific Plan.

PPP PS-5 The project applicant is required submit an overall Fire Master Plan at the time of the Brea 265 Specific Plan approval to be reviewed and approved by the City of Brea Fire Department as conditions of approval. The conditions of approval will also require that the project applicant submit separate fire plans at the time of tentative tract map review process for individual planning area to be reviewed and approved by the Brea Fire Department.

PPP PS-6 The project applicant is required to pay fees pursuant to the approved Development Agreement to provide two “Activated Snorkel Station–Heli-Hydrant” facilities as dipping sites for aerial firefighting aircraft tasked with responding to wildfires. The Activated Snorkel Station–Heli-Hydrant facilities will be on a site owned by the project applicant and agreed to by the City of Brea.

PPP PS-7 The project applicant is required to reserve a one-acre graded pad site at the northwestern corner of Lambert Road and Valencia Avenue for the construction of a public safety/civic uses purposes by the City of Brea.

Project Design Features

PPP PS-8 The Brea 265 Specific Plan will provide a minimum of 170 feet on-site of interface distance according to the City of Brea’s Very High Fire Hazard Severity Zone–Fuel Modification requirements, as reviewed and approved by the Fire Code Official. Maintenance of the fuel modification area will be the responsibility of the homeowners association. Figure 5.20-2, *Fuel Modification Areas*, shows the proposed fuel modification areas.

PPP PS-9 All development associated with the Brea 265 Specific Plan will be designed, built, and operated in accordance with the Brea Fire Department’s Very High Fire Hazard Severity Zone–Fuel Modification requirements.

PPP T-4 A site-specific construction worksite staging and traffic control plan will be prepared and submitted to the City of Brea for review and approval prior to the start of any construction work. This plan will include such elements as the location of any potential partial lane closures, hours during which lane closures (if any) would not be allowed, local traffic detours (if any), and protective devices and traffic controls (such as barricades, cones, flag persons, lights,

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warning beacons, temporary traffic signals, warning signs). The proposed project will be required to comply with the City-approved plan measures.

5.15.1.4 ENVIRONMENTAL IMPACTS

The following impact analysis addresses the thresholds of significance; the applicable thresholds are identified in brackets after the impact statement

Impact 5.15-1: The proposed project would not result in a substantial adverse physical impact associated with the provisions of 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 for fire protection services. [Threshold FP-1]

Additional population and residential development from the proposed project would increase the demand for fire protection facilities and personnel within the Brea Fire service boundaries. Mutual aid for the project area is provided by the Los Angeles County Fire Department, Fullerton Fire Department, Orange County Fire Authority, and Placentia Fire and Life Safety Department. The unincorporated area of the project site would be annexed into the city and served by the Brea Fire Department after the proposed project is approved.

The proposed project would likely increase the calls to Metro Net, potentially resulting in delays to arrival on scene. However, the proposed project is required to participate in the development impact fee program or pay in-lieu fees (PPP PS-2) and go through the project review process to ensure that the development is constructed in accordance with the applicable Fire Code and Health and Safety Code (PPP PS-1 and PPP PS-3), and that adequate fire services and infrastructure are available to accommodate the proposed development. An overall Fire Master Plan for the proposed project would be submitted for review and approval by the Brea Fire Department with the final Brea 265 Specific Plan approval. And during the development review and permitting process, Brea Fire Department would review and approve a fire master plan(s) for each planning area to ensure that emergency access, water and accessibility to each residential building and lot is provided to serve the needs of the fire department (PPP PS-5). The required building plan check for site plan and emergency access would ensure that the proposed project incorporates appropriate fire safety features to reduce project impacts (PPP PS-4). All development associated with the Brea 265 Specific Plan would be designed, built, and operated in accordance with the City's Very High Fire Hazard Severity Zone–Fuel Modification requirements (PPP PS-8 and PPP PS-9).

The nearest fire station to the project area is Fire Station #3 at 2600 E. Santa Fe Road, approximately 0.4 mile to the west; Fire Station #4 at 198 N Olinda Place, approximately 2 miles east of the project site, is also anticipated to serve the project site. The existing average response time for Brea Fire ranges from 4 minutes 47 seconds to 5 minutes 4 seconds, and the City's goal is to respond within 4 minutes for the first fire apparatus to arrive on scene, and 8 minutes for a multiunit response team to arrive on scene. Implementation of the proposed project would result in increased services demands at Fire Station #3 and Station #4.

According to the Brea Fire Department, Fire Station #4 routinely experiences increased response times because of traffic during commuting hours. Carbon Canyon Road is a two-lane roadway (one in each direction) that

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experiences restricted ingress and egress through the canyon; the increased number of vehicles on the road due to the proposed project could result in delayed response times. The Brea Fire Department indicated that the traffic delays, coupled with understaffing at Fire Station #4, could affect the department's ability to provide adequate fire services to the proposed project. The first personnel to arrive at the scene have to wait for the second unit to arrive before interior firefighting can begin, and the second unit could be delayed by additional traffic or lack of appropriate staffing to meet the new demands from the proposed project. The following relevant factors have been identified as Brea Fire Department's potential inability to provide adequate service to the project site:

- Increase in traffic.
- Increased ingress and egress in and around the surrounding roads that would increase response times.
- Increase in call volume.
- Construction of 1,100 residential units requires additional staffing to adequately provide effective firefighting force.
- An increased exposure to wildland fires because the project area is designated Very High Fire Hazard Severity Zone.

However, the project applicant will be required to implement PPP PS-1 through PPP PS-9, thereby reducing project impacts to Brea Fire Department. In addition to contributing to additional funds toward essential fire and public safety priorities, which would be paid in lieu of fire impact and fire service fees, and compliance with buildings standards, the project applicant would contribute to provision of additional fire and public safety facilities to benefit the hillside area. The project applicant will provide funding for two "Activated Snorkel Station Heli-Hydrant" facilities as dipping sites for aerial firefighting aircraft tasked with responding to wildfires in the hills immediately to the north of the project site. These facilities would be on a property owned by the project applicant and agreed to by the City (PPP PS-6). It is anticipated that permitting, construction, and maintenance of the facilities would be the responsibility of the City, and environmental impacts from construction and operation of the facilities is not under the purview of this DEIR analysis. The project applicant is also reserving a one-acre, graded pad site at the northwestern corner of Lambert Road and Valencia Avenue for future development of public safety/civic uses by the City (PPP PS-7).

Provided that the project is required to implement PPP PS-1 through PPP PS-9, and PPP T-4, the proposed project would not result in a substantial adverse physical impact related to fire protection services, and impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant impact with implementation of PPP PS-1 through PPP PS-9.

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5.15.1.5 CUMULATIVE IMPACTS

The proposed project, along with other cumulative projects in Brea, would result in increased fire protection demands within the Brea Fire Department's service boundaries. The proposed project would be constructed in phases so that necessary infrastructure and public facilities are constructed to adequately serve the development. The proposed project and other development projects in the city would be required to implement PPP PS-1 through PPP PS-5, which include compliance with the California Health and Safety Code, the City of Brea's Municipal Code and Brea Fire Code; payment of development impact fee fees; and review and approval of building plans, emergency access plans, and fire master plan by the fire department to reduce impacts. Additionally, the proposed applicant is required to implement PPP P PS-6 and PPP PS-7, which would benefit other hillside development in the area by providing locations for fire service and public safety/civic use facilities that would be beneficial to other city residents. And although the project site is in a very high FHSZ, the proposed project is required to be developed in accordance with the Brea Fire Department's Very High Fire Hazard Severity Zone-Fuel Modification requirements (PPP PS-8 and PPP PS-9). It is anticipated that other cumulative projects in Brea would also be required to provide or pay fees to provide adequate on- and off-site fire protection infrastructure. Therefore, with implementation of PPP PS-1 through PPP PS-9, the Brea Fire Department would be able to maintain adequate fire protection levels and response times in the city, and this cumulative impact would be considered less than significant.

Level of Significance Before Mitigation: Less than significant impact.

5.15.1.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of the plans, programs, and policies, the following impact would be less than significant: 5.15-1.

5.15.1.7 MITIGATION MEASURES

No mitigation measures are required.

5.15.1.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant impacts related to fire services were identified without mitigation; no significant and unavoidable adverse impacts would occur.

5.15.2 Police Protection

5.15.2.1 ENVIRONMENTAL SETTING

Regulatory Background

Local Regulations

City of Brea General Plan

The Brea General Plan policies support the City's fire and police services.

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- **Policy PS-1.1.** Work with the Police Department to determine and meet community needs for law enforcement.
- **Policy PS-1.2.** Provide up-to-date technology to the Brea Police and Fire Department.
- **Policy PS-1.3.** Continue to maintain and develop a community-based police strategy compatible with the needs and size of the community.
- **Policy PS-1.5.** Maintain a maximum 4- to 6-minute emergency response time for fire safety services. Maintain a 3- to 5-minute response time from emergency police response services. Require that all new development be able to meet established standards for such response.
- **Policy PS-1.7.** Incorporate the tenets of Community Oriented Policing into the design of crime prevention and enforcement programs.
- **Policy PS-1.8.** Use technology to improve crime prevention efforts.

Existing Conditions

Law enforcement and police protection services are provided by the Brea Police Department (BPD) headquartered at 1 Civic Circle in Brea. BPD is divided into the uniform division and support services division, directed by two captains (Brea 2021b, 2021). These two divisions are comprised of a K-9 unit, communications center, crime suppression unit, several investigation units, patrol unit, professional standards unit, S.W.A.T. unit, threat management unit, and traffic unit (Brea 2021b). The existing staffing levels are 61 full-time sworn officers, 29 full-time nonsworn employees, and 19 part-time nonsworn employees. There are over 40 patrol officers in the uniform division, and their duties include:

- Response to emergency, in-progress crimes.
- Conduct on-scene investigations, including fingerprinting, photography, interviewing, and interrogation.
- Write crime reports documenting incidents.
- Arrest and book criminal offenders.
- Stop traffic violators and warn or cite the driver.
- Patrol their assigned area, checking residential and business areas for illegal activity. (Brea 2018c)

The BPD Communications Center includes a communications supervisor, four senior dispatchers, six full-time dispatchers, and nine part-time dispatchers; it operates 365 days a year, 24 hours a day (Brea 2021e). Calls for service are prioritized into several categories, with emergency calls being the most important; the department's average response time has been under 3.5 minutes (Brea2021e).

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Response Times

BPD's desired emergency response time is 3 minutes and 30 seconds, and nonemergency response times average 6 minutes or greater depending on the call nature and call volume. The General Plan Policy PS-1.5 identifies the goal is to maintain a maximum 3- to 5-minute emergency response time for police services.

Dispatch Impact Fees

The City of Brea established these fees as necessary for providing upgrades to the police and fire dispatch systems, ensuring that new development is provided with appropriate public safety services (Brea 2018a).

- Multifamily: \$40/dwelling unit
- Single family: \$55/dwelling unit
- Commercial: \$55/1,000 square feet
- Office: \$ 77/1,000 square feet
- Industrial: \$40/1,000 square feet

5.15.2.2 THRESHOLDS OF SIGNIFICANCE

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

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

5.15.2.3 PLANS, PROGRAMS, AND POLICIES

Project Design Features

PPP PS-10 As part of the project review process, the City of Brea Police Department will recommend the following project design features to improve security on-site, and the Project Applicant will incorporate these design features as appropriate.

- Provide individual mailboxes rather than gang mailboxes to reduce mail theft vulnerability.
- All common areas should be properly lit to increase surveillance and discourage unwanted activities.
- All trail/park areas should include connectivity for potential future surveillance camera locations.
- Provide the maximum amount of off-street parking.

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PPP PS-11 The project applicant will consult with Brea Police Department on street addressing and signage, particularly in high density areas.

Regulatory Requirement

PPP PS-12 The project applicant is required to pay dispatch impact fees and all other development impact and/or special assessment fees as deemed applicable by the City of Brea.

5.15.2.4 ENVIRONMENTAL IMPACTS

The following impact analysis addresses the thresholds of significance; the applicable thresholds are identified in brackets after the impact statement.

Impact 5.15-2: The proposed project would not result in a substantial adverse physical impact associated with the provisions of new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, however, the proposed project could adversely affect service ratios, response times, or other performance objectives for police protection services. [Threshold PP-1]

The Brea Police Department at Brea Civic and Cultural Center provides police protection service to Brea, including the project site. According to BPD, it is anticipated that the proposed project would increase calls for service, total numbers of crimes, officer-initiated activity (traffic enforcement, preventative patrol, etc.), 9-1-1 calls into the Communications Center, and need for community outreach. The ratio of police officers is 1.4 officers per 1,000 population, and the addition of 1,100 units is estimated to generate 400 to 450 police incidents per year. Projected types of incidents include burglary, theft, alarm activations, disturbances, suspicious persons and vehicles, traffic and parking complaints, and traffic enforcement. Police officers patrol within the city's service boundaries, and all calls for service are dispatched from the BPD Communications Center.

In February 2020, the City retained a consultant to prepare a staffing needs analysis for the BPD, and it recommended that three police officers be added to patrol positions by June 2022 and two more officers to patrol by June 2024. This staffing analysis report included data from the proposed project as "projected residential growth factor" to analyze future staffing needs and make adjustments. Funding for police resources comes primarily from the property tax revenue, and with phased development of the proposed project, the property tax collection would grow incrementally to offset the expected increase in police service staffing needs. Though no physical expansion or construction of police facilities would be required to house five additional patrol officers, BPD has identified a need for additional funding to train staff and procure associated equipment. Therefore, in addition to the dispatch impact fees and other development impact fees, the project applicant would pay special assessment fees to provide adequate training and equipment for BPD (PPP PS-12). Additionally, the project applicant has reserved a one-acre site at the northwestern corner of Lambert Road and Valencia Avenue for the construction of a police substation and fire station (PPP PS-6).

The proposed project is of quality design, as discussed in Section 5.1 *Aesthetics*, of this Draft EIR, and would not include features that could lead to high crime rates. As shown on Figure 3-14, *Circulation Plan*, the proposed project would provide gated access to the east side of the project site and no gated entries would be provided

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on the west side of the project site. While gates access could hinder emergency response and deter preventive patrols, a gated community could also minimize opportunistic burglaries, increase privacy, and act as crime deterrent. Although the proposed project would implement PPP PS-10 and PPP PS-11 to encourage natural surveillance and discourage crimes, additional site planning and crime prevention features would be necessary to further ensure that BPD can respond quickly and effectively to calls for assistance. It is also anticipated that the proposed project would have an HOA to provide quality maintenance to create an environment that does not invite vandalism and other crimes.

The proposed project would result in increased traffic in the area roadways, potentially affecting the response times for police services. However, traffic impacts within the jurisdiction of the City of Brea would be reduced to a less than significant level with implementation of various roadway improvements, as discussed in Appendix N, *Traffic Study*, and potential increase in response times would not result in physical environmental impacts to police services.

Level of Significance Before Mitigation: Potentially significant impact.

5.15.2.5 CUMULATIVE IMPACTS

Implementation of the proposed project in conjunction with other development in the City would increase the overall police services demands for BPD. However, buildout of the proposed project along with other City development would occur over an extended period of time, and there is no current plan to expand or construct police facilities. Increased demand for additional staffing and equipment would be accommodated with applicable fee and tax payment during budget allocation process. The fees and tax revenues generated by cumulative projects in the city are anticipated to maintain safe police protection services. No long-lasting adverse physical impacts are anticipated from providing adequate police service to the project site and its vicinity. No significant cumulative impacts are expected to occur related to police protection facilities.

Level of Significance Before Mitigation: Less than significant impact.

5.15.2.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

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

- **Impact 5.15-2** Implementation of the proposed project could result in adverse police protection service impact without adequate site design features.

5.15.2.7 MITIGATION MEASURES

PS-1 Prior to issuance approval of each tentative tract map, the project applicant shall demonstrate compliance with the site planning guidelines referred to as Crime Prevention Through Environmental Design (CPTED). CPTED is based on the principle that proper design and effective use of buildings and public spaces in neighborhoods can lead to a reduction in the fear and incidence of crime, and an improvement in the quality of life. These guidelines are intended to optimize the ability of the police department to respond quickly and effectively to calls for assistance and also to incorporate crime prevention measures into the design of

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future homes, open space areas, and public trails. Examples of such measures include minimizing vegetation or structural screening that could obstruct visibility into public parks by passing patrol units; installation of special locks and/or electronic security devices; incorporation of practical access control (doors, fences); promote surveillance through minimum security lighting, windows, and landscaping; and provide territorial reinforcement through proper signage and sidewalks.

5.15.2.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of mitigation measure, impacts related to police service would be reduced to a less than significant level, and no significant and unavoidable adverse impacts would occur.

5.15.3 School Services

5.15.3.1 ENVIRONMENTAL SETTING

Regulatory Background

State

California State Assembly Bill 2926: School Facilities Act of 1986

To assist in providing school facilities to serve students generated by new development, Assembly Bill (AB) 2926 was enacted in 1986 and authorizes a levy of impact fees on new residential and commercial/industrial development. The bill was expanded and revised in 1987 through the passage of AB 1600, which added Sections 66000 et seq. to the Government Code. Under this statute, payment of impact fees by developers serves as CEQA mitigation to satisfy the impact of development on school facilities.

California Senate Bill 50

Senate Bill (SB) 50, passed in 1998, provides a comprehensive school facilities financing and reform program and enables a statewide bond issue to be placed on the ballot. Under the provisions of SB 50, school districts are authorized to collect fees to offset the costs associated with increasing school capacity as a result of development and related population increases. The funding goes to acquiring school sites, constructing new school facilities, and modernizing existing school facilities. SB 50 establishes a process for determining the amount of fees developers would be charged to mitigate the impact of development on school districts from increased enrollment. According to Section 65996 of the California Government Code, development fees authorized by SB 50 are deemed to be “full and complete school facilities mitigation.”

Under this legislation, there are three levels of developer fees that may be imposed upon new development by the governing school district. Level I fees are assessed based upon the proposed square footage of residential, commercial/industrial, and/or parking structure uses. Level II fees require the developer to provide one-half of the costs of accommodating students in new schools, and the state provides the remaining half. To qualify for Level II fees, the governing board of the school district must adopt a School Facilities Needs Analysis and meet other prerequisites in accordance with Section 65995.6 of the California Government Code. Level III

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fees apply if the state runs out of bond funds, allowing the governing school district to impose on the developer 100 percent of the cost of school facility or mitigation minus any local dedicated school monies.

Existing Conditions

Enrollment and Capacity

The Brea Olinda Unified School District (BOUSD) consists of six elementary schools, one junior high school, one high school, and one continuation high school and serves approximately 6,000 students (BOUSD 2018). Table 5.15-2, *School Enrollment and Capacity*, provides the enrollment and capacity per school that would serve the project site.

Table 5.15-2 School Enrollment and Capacity

School and Location	Enrollment (7-year average)	Total Capacity	Remaining Capacity
Olinda Elementary School	623	850	227
Brea Junior High School	909	1,248	339
Brea Olinda High School	1,806	2,720	914

Source: PlaceWorks 2021; CDE 2021.

Development Impact Fees

The school district has adopted a fee program pursuant to SB 50 that levies statutory school impact fees per residential building square footage.

- Residential: \$4.08/square foot (Cooperative Strategies 2018)

5.15.3.2 THRESHOLDS OF SIGNIFICANCE

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

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

5.15.3.3 PLANS, PROGRAMS, AND POLICIES

- PPP PS-13 Pursuant to AB 2926, new development is required to pay development impact fees to assist in providing school facilities to serve students generated by new development.
- PPP PS-14 Pursuant to SB 50, new development is required to offset the costs associated with increasing school capacity, where the funds collected go to acquiring school sites, constructing new school facilities, and modernizing existing school facilities.

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5.15.3.4 ENVIRONMENTAL IMPACTS

The following impact analysis addresses the thresholds of significance; the applicable thresholds are identified in brackets after the impact statement.

Impact 5.15-3: The proposed project would not result in a substantial adverse physical impact associated with the provisions of new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives for school services. [Threshold SS-1]

The project site is within the attendance boundaries of Olinda Elementary School, Brea Junior High School, and Brea Olinda High School. According to the California Department of Education, the enrollment at Olinda Elementary School has increased in the past seven years from 563 kindergarten through 6th graders in 2014-15 to 601 students in 2020-21 (CDE 2021). For Brea Junior High School, student enrollment also increased slightly in the past seven years—from 891 students in 2014-15 to 929 students in 2020-21 in grades 7 and 8. Brea Olinda High School’s enrollment of 9th through 12th grade students declined—from 1,895 in 2014-15 to 1,758 students in 2020-21.

Table 5.15-3, *Student Generation Summary*, shows the anticipated number of students generated by the proposed project. There are no students under the existing condition, and implementation of the proposed project would generate approximately 196.3 elementary students, 57.3 middle school students, and 105.2 high school students, a total of 359 additional students. As shown in Table 5.15-2, the existing school facilities are anticipated to have adequate capacity for the additional students generated by the proposed project without having to build new or expanded school facilities.

Table 5.15-3 Student Generation Summary

School Level	Student Generation Factors		Units	Total Students	
Elementary (Grades K–6)	SF Detached Units	0.2351	450	405.795	196.3
	MF Attached Units	0.1392	650	90.48	
Middle (Grades 7–8)	SF Detached Units	0.0673	450	30.285	57.3
	MF Attached Units	0.0415	650	26.975	
High (Grades 9–12)	SF Detached Units	0.1300	450	58.5	105.2
	MF Attached Units	0.0718	650	46.67	
Total			1,100	-	358.7

Source: Cooperative Strategies 2020.

Furthermore, the increased demand for school facilities would be accommodated through the payment of development fees. The funding program established by SB 50 has been found by the legislature to constitute “full and complete mitigation of the impacts” on the provision of adequate school facilities (Government Code Section 65995(h)). SB 50 sets forth a state school facilities construction program that includes restrictions on a local jurisdiction’s ability to demand mitigation of a project’s impacts on school facilities in excess of fees in Education Code section 17620. Payment of impact fees as adopted by BOUSD and in compliance with SB 50 would reduce impacts to an acceptable level.

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Level of Significance Before Mitigation: Less than significant impact with implementation of PPP PS-13 and PS-14.

5.15.3.5 CUMULATIVE IMPACTS

The 1,100 additional housing units allowed by the proposed project would increase the demand on school facilities at Olinda Elementary School, Brea Junior High School, and Brea Olinda High School, and other development projects in the BOUSD boundary would cumulatively impact BOUSD's ability to provide adequate educational services. However, compliance with the fee program established by SB 50 would ensure that adequate mitigation is provided. The program under SB 50 has been found by the legislature to constitute "full and complete mitigation of the impacts of any legislative or adjudicative act on the provision of adequate school facilities." The fees authorized for collection by BOUSD are therefore deemed full and adequate mitigation of impacts on those districts. Therefore, no significant cumulative impacts are expected to occur to school services.

5.15.3.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of the plans, programs, and policies, the following impact would be less than significant: 5.15-3.

5.15.3.7 MITIGATION MEASURES

No mitigation measures are required.

5.15.3.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No potentially significant impacts related to school service have been identified without mitigation; therefore, no significant and unavoidable impacts would occur.

5.15.4 Library

5.15.4.1 ENVIRONMENTAL SETTING

Regulatory Background

Local Regulations

City of Brea General Plan

The General Plan contains the following goal and policies for providing library resources to the city.

Goal CS-4: Provide library resources that meet the educational, cultural, civic, business, and life-long learning needs of all residents. Retain a local library system that is community-oriented, provides knowledgeable, service-oriented staff, and offers access to information, books, and other materials in a variety of formats that use contemporary technology:

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- **Policy CS-4.1.** Encourage the County to develop programs and services for adults, children, and new readers that meet future needs.
- **Policy CS-4.2.** Work with library staff to assess, select, organize, and maintain collections of materials and information sources of value to and desired by the community.
- **Policy CS-4.3.** Work with library staff to maintain technological services that meet the needs of residents, as well as reader advisory, reference and referral services, responsive to user needs.
- **Policy CS-4.4.** Explore funding opportunities for the City to expand the existing County branch library and/or operate a local, independent library.

Existing Conditions

Brea Branch Library

The Brea Branch Library is part of the Orange County Public Library (OCPL) community library network, which includes 33 branches throughout Orange County. OCPL is a dependent special district governed by the Orange County Board of Supervisors. It is the third largest local library system in California.

The Brea Branch Library is at 1 Civic Center Circle in Brea. It offers an assortment of materials and programs—including books, newspapers, magazines, videos and DVDs, music CDs, audiobooks, and digital services such as ebooks, audiobooks, and subscription databases (Brea 2019). Programming includes activities for all ages such as story times, craft programs, book clubs, individualized computer instruction, a writers group, and the annual Summer Reading Program. The library benefits with support and advocacy from the Friends of the Brea Library, an independent, nonprofit organization.

5.15.4.2 THRESHOLDS OF SIGNIFICANCE

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

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

5.15.4.3 PLANS, PROGRAMS, AND POLICIES

There are no existing plans, programs, and policies applicable to the proposed project.

5.15.4.4 ENVIRONMENTAL IMPACTS

The following impact analysis addresses the thresholds of significance; the applicable thresholds are identified in brackets after the impact statement.

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Impact 5.15-4: The proposed project would result in a substantial adverse physical impact associated with the provisions of new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives for library services. [Threshold LS-1]

The proposed project is anticipated to increase the city's population by 3,102 residents and therefore would also increase the number of potential library users. Residents of Orange County can use any library in the OCPL system if they are a member; this analysis focuses on OCPL libraries in the City of Brea. Orange County's service standard is 0.2 square foot of facilities and 1.5 book volumes per capita for residential communities. Therefore, the increase in population would require additional library space of 620.4 square feet and 4,653 book volumes. It should be noted that the OCPL also provides a wide range of online electronic and digitized resources that do not require physical library space. Funding would be required to provide the additional books to meet the service standard. Revenue for OCPL comes primarily from the property tax revenue, supplemented by other sources such as impact fees program. In November 2021, the Orange County Board of Supervisors approved to indefinitely eliminate library late fines to further provide free and equal access to services. Generally, impact fees are assessed on new development to help pay for public infrastructure required to accommodate the new development. The City of Brea does not have an established fee schedule for library impact. Although property tax revenue is anticipated to grow proportionally with the property tax collection as development occurs, adding 1,100 units within the OCPL service boundaries would require additional library resources. Therefore, this impact is considered potentially significant.

Level of Significance Before Mitigation: Potentially significant impact.

5.15.4.5 CUMULATIVE IMPACTS

Implementation of the proposed project in conjunction with the cumulative projects in the City of Brea would result in added library services demand in the current library system. However, as with the proposed project, other development projects would also contribute to the property tax revenues that would fund the County's library system and would be required to pay library impact fees to offset its fair-share of the cost of providing additional library resources within the OCPL system. No significant cumulative impacts are anticipated to occur related to library services.

5.15.4.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

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

- **Impact 5.15-4** Implementation of the proposed project would result in increased demands for library services.

5.15.4.7 MITIGATION MEASURES

PS-2 Prior to each building permit, the Project Applicant shall pay library impact fees to the County of Orange to offset its fair share of the costs of providing additional library resources and shall provide proof of payment to the City of Brea. A fair-share cost per unit shall be established in coordination with the County of Orange.

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5.15.4.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of Mitigation Measure PS-2 would reduce potential impacts associated with library services to a level that is less than significant. Therefore, no significant unavoidable adverse impacts relating to library services would remain.

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