

Section 14

Increased Demand for Fire Services

This section describes how development associated with the *City of Modesto Urban Area General Plan* (UAGP) would affect demand for fire services.

A. ENVIRONMENTAL SETTING

The following information is provided in accordance with Section 15125 of the California Environmental Quality Act (CEQA) Guidelines. This environmental setting is the baseline for determining whether an impact of the UAGP is significant.

1. Study Area for Direct Impacts

The study area for direct impacts related to increased demand for fire services is the UAGP planning area.

2. Study Area for Cumulative Impacts

This analysis will be based on the plan or projection approach to examining cumulative effects, as provided under State CEQA Guidelines Section 15130(b)(1)(B). The pertinent plan used for this purpose is the UAGP. The study area for cumulative impacts on fire services is the UAGP planning area.

3. Existing Physical Conditions in the Study Area

a. Overview

Fire protection within the city limits is provided by the Modesto Fire Department. Average response time is 4.5 minutes. From 2000 to 2014, approximately 92 percent of all calls were answered within six minutes of dispatch. The Modesto Fire Department serves an area of approximately 37 square miles and approximately 87,000 housing units (City of Modesto Fire Department 2015).

The Modesto Fire Department consists of 11 fully staffed stations, with additional stations planned in northeast Modesto. Each station in the department is equipped with one “Type 1” engine and three firefighters, with the exception of Stations 8 (Harry Sham Field) and 11, which are staffed with a four- and three-firefighter truck company, respectively. In addition, Station 8 houses Aircraft Rescue / Firefighting apparatus that meets the requirements of the Federal Aviation Administration and Code of Federal Regulations Part 139. Fire stations are strategically located throughout the City so that residents are not more than three miles from a first responder (City of Modesto Fire Department 2015).

At least 34 firefighters and one battalion chief are on duty each 24-hour shift, and the department has a total of 151 authorized staff members and 138 sworn staff members (City of Modesto Fire Department 2007). As of 2014, the department also employs a Fire Marshal, Deputy Fire Marshal, and three Fire Technicians who direct most fire prevention programs. Fire Department equipment includes nine engines and two trucks (City of Modesto 2015).

The Fire Department strives to achieve the following standards in 90 percent of all cases: a service standard of “first in” response time in all areas of the city within six minutes of dispatch; a “full alarm assignment” consisting of four engines, one truck, one Battalion Chief, and 16 personnel on scene within 10 minutes; and a “second alarm assignment” consisting of three additional fire units with a minimum of nine personnel within 15 minutes of dispatch (City of Modesto 2015).

From 2005 to 2014, the Modesto Fire Department received an average of 22,306 calls for service per year. Of those calls, 1,164 or 5.2 percent on average were for fire emergencies; 232 or one percent were for structure fires; 14,544 or 65 percent were for medical aid; 429 or two percent were for hazardous materials incidents; and 6,170 or 27.6 percent were for other emergencies (City of Modesto 2015.)

Fire services in the unincorporated areas included within the UAGP boundary are provided by the Burbank / Paradise, Salida, Industrial, and Woodland Avenue Fire Protection Districts, and the Stanislaus Consolidated Fire Protection District. Each of these districts is at least partially within the City’s Sphere of Influence (Stanislaus Local Agency Formation Commission 2015).

These fire districts, their current staffing, and general type of service are listed in Table V-14-1. Because most of these districts are only partially within the City’s Sphere of Influence, these staffing levels do not correspond to the number of fire fighters serving the sphere areas.

Table V-14-1. Fire Protection Districts

District	Total Staff	Full-Time	Volunteers	Type of Service
Burbank-Paradise	34	0	34	suburban
Industrial	<u>(JPA w/ cities of Modesto and Ceres)</u>	n/a	n/a	suburban
Salida	21	8	13	suburban
Stanislaus Consolidated	99	76	20	urban
Woodland Avenue	27	0	27	rural

Source: Stanislaus LAFCo 2018

The rural level of service standard is characterized as a fire company equipped to handle basic structural fires and related emergencies that will arrive within 15 minutes of travel time, accompanied by other vehicles and capable of sustaining a 500-gallon-per-minute fire flow for one hour. The suburban level of service is characterized as a fire company equipped to handle all “risk emergencies” that will arrive within five to six minutes of travel time and capable of sustaining a flow for a 2,000-square-foot occupancy for one hour. An urban level of service is characterized as a fire company equipped to handle all risk emergencies that will arrive within five minutes of travel time 90 percent of the time, and capable of sustaining adequate fire flow for the designated risk level in the area. These are broad characterizations

of levels of service and do not necessarily reflect the district's effectiveness or efficiency in dealing with a given emergency. (Stanislaus Local Agency Formation Commission Countywide Fire Services Municipal Service Review 2007.)

The Stanislaus Regional 9-1-1 Joint Powers Authority, which includes the various fire protection districts, distributes 911 emergency calls to the respective fire protection district with jurisdiction over the site of the emergency. There are mutual-aid agreements among the districts to provide for cross-jurisdictional assistance should a fire district need assistance responding to an emergency. (Stanislaus LAFCo Countywide Fire Services Municipal Service Review 2007.)

4. Existing Policies Applying to the Study Area

Below is a comprehensive list of major federal, state, and local policies or summaries of policies in effect that apply to the study area. This list provides the full range of applicable policies that a project within the study area would potentially need to comply with, including policies beyond the jurisdiction of the City. This list of laws, regulations, and programs also serves to describe the circumstances under which the Master EIR analyzed this environmental topic.

A discrete reference number, following the initials of the resource topic, is assigned to each policy or policy summary listed to facilitate its identification elsewhere in this Master EIR or, where appropriate, its incorporation as a mitigation measure into subsequent projects analyzed under this Master EIR (e.g., Fire Service policies are designated as FS-*X*, where *X* is the discrete number).

a. Federal and State Policies

There are no applicable federal or state policies.

b. Stanislaus Local Agency Formation Commission Policies

The Cortese-Knox-Hertzberg Local Government Reorganization Act (Government Code Section 56000, et seq.) empowers each county Local Agency Formation Commission (LAFCo) to consider incorporation of new cities, annexation of lands to existing cities and special districts, and other changes to city and district boundaries. In order to carry out its responsibilities for planning orderly development and coordination of local government agencies, the LAFCo develops a sphere of influence of each local government agency within the county, with respect to present and probable need for fire services in the area. LAFCo policies discourage "sprawl" (i.e., a pattern of development characterized by LAFCo by the inefficient delivery of important urban services, such as fire protection). By discouraging sprawl, the LAFCo promotes a more efficient system of local government agencies. When determining spheres of influence for cities and special districts, the LAFCo must conduct a service review of the municipal services provided in an area, as determined by the LAFCo. The Municipal Service Review (MSR) is a comprehensive review of all the agencies that provide the service within the identified area. Typical municipal services include police, fire, sewer, water, and storm drainage services. When conducting the MSR, the LAFCo must prepare a written statement of its determinations with respect to the factors identified in

Government Code Section 56430. These factors require consideration of infrastructure needs, projected demand from future growth, financing constraints and opportunities, and options for the administration of services.

Pursuant to California Revenue and Taxation Code Section 99, as part of an annexation under the Cortese-Knox-Hertzberg Act, the annexing City must provide the LAFCo an agreement approved by the affected special district that describes how property taxes collected from the area proposed to be annexed will be split between the city and the special district. LAFCo will memorialize this agreement as part of its proceedings.

The Stanislaus LAFCo considers the provision of adequate fire service in connection with approval of annexations and the establishment of spheres of influence. Adopted LAFCo policies require that when a local agency submits a resolution of application for a change in organization or reorganization, a plan for service must be prepared and submitted to the LAFCo by the local agency proposing the annexation. A Plan for Services must include information that the range and level of services currently available within the existing boundaries will be at least maintained in the proposed annexation area. Annexations that reduce the existing levels of service will not be approved by the LAFCo.

c. Stanislaus County Policies

The territory outside the city limits is under Stanislaus County jurisdiction. The Stanislaus County General Plan has no applicable policies related to fire protection.

d. City of Modesto Policies

The UAGP provides the following policies related to fire protection.

(1) Baseline Developed Area, Downtown Area and Planned Urbanizing Area

- FS-1:** Maintain adequate fire flows in relation to structure size, design, and requirements for construction and/or built-in fire protection systems in accordance with the California Fire Code and adopted local ordinances. Determination of adequate fire flows includes factors such as storage capacity, system gridding, hydrant spacing, and spacing and sizing of water mains. (UAGP Policy VI.K.1)
- FS-2:** Ensure adequate ingress and egress to all structures for fire fighting and rescue purposes independent of privately owned and maintained driveways. Provide protection of life and property through the use of engineered fire protection systems, including roof systems. (UAGP Policy VI.K.2)
- FS-3:** Practice timely adoption of the current edition of the California Fire Code including local ordinances designed to address local conditions. The California Fire Code may be amended to suit local conditions. (UAGP Policy VI.K.3)
- FS-4:** Ensure that fire stations, apparatus, equipment, and personnel are in place concurrent with construction in the Planned Urbanizing Area. (UAGP Policy VI.K.4)

- FS-5:** Future fire station sites and facilities should be closely coordinated with existing and planned public parks, libraries, and other activity centers in order to encourage maximum efficiency of public facilities. (UAGP Policy VI.K.5)
- FS-6:** Promote fire-safe behaviors within the community through public fire education activities and programs. (UAGP Policy VI.K.6)
- FS-7:** Maintain its readiness to mitigate man-made or natural disasters through maintenance and implementation of the Multi-Hazard Functional Plan, the Multi-Hazard Mitigation Plan, and the Emergency Operations Plan. (UAGP Policy VI.K.7)
- FS-8:** Maintain equipment, staffing, and facilities to provide Emergency Medical Services, Fire Prevention and Suppression, Urban Search and Rescue, and Hazardous Materials Response Capabilities. (UAGP Policy VI.K.8)
- FS-9:** Provide an adequate Fire and Life Safety Delivery system through the achievement of the following standards.
- (a) Maintain an emergency response system capable of achieving the following standards in 90 percent of all cases.
- The first fire emergency response unit arrives within six minutes of dispatch.
 - A full alarm assignment consisting of four engines, one truck, one Battalion Chief, and 16 personnel arrives within ten minutes of dispatch.
 - A second alarm assignment consisting of three additional fire units with a minimum of nine personnel arrives within 15 minutes of dispatch.
- FS-10:** Protect life and property by requiring engineered fire protection systems and fire resistive roof systems as part of all new construction; in situations where access is limited, fire sprinklers shall be required for new construction. (UAGP Policy VI.K.10)
- FS-11:** Provide an effective prevention program aimed at fire loss reduction through inspection, investigation, and public education. (UAGP Policy VI.K.11)
- FS-12:** Coordinate with affected fire protection districts when an annexation to the City is proposed, and before it has been finalized, regarding fire protection and other emergency services. (UAGP Policy VI.K.12)

The UAGP also provides the following urban services policy within the Planned Urbanizing Area only.

- FS-13:** Each Specific Plan should be accompanied by a long-range financing strategy that provides reasonable estimates of the costs of on- and off-site infrastructure to support the proposed development pattern. The strategy should generally address public facility funding, including schools, for any development project that serves to implement the subject Comprehensive Plan. If new public facilities are required that will also serve the broader community, the Specific Plan should include options for broad-based funding mechanisms. Each Specific Plan should address the need to provide water, wastewater and storm drainage infrastructure, in the context of the required Facilities Master Plan and Infrastructure Master Plan prepared at the developer's expense. (UAGP Policy III.I.4)
- FS-14:** Negotiate with affected fire protection districts when an annexation to the City is contemplated and before it has been effected to determine whether the boundary change may result in the erosion of fire protection or other emergency services. Any resulting agreements must be approved by City Council and the governing board of the fire protection district prior to City Council approval of the annexation. Options range from the consolidation of the fire protection district into Modesto City Fire to revenue sharing. (UAGP Policy VI.K.13)

5. Policies That Avoid Impacts

The following City policies are in effect and have been determined to reduce, avoid, or mitigate environmental impacts within the existing city limits and Planned Urbanizing Area as they annex and develop. LAFCo policies are included because they reduce or avoid cumulative impacts. The policy reference numbers are listed, and the full text of these policies is found in Section A-4 above, *Existing Policies Applying to the Study Area*.

a. Stanislaus Local Agency Formation Commission Policies

The LAFCo will only approve annexations with a plan for service that demonstrates provision of services would not be reduced or eliminated.

b. City of Modesto Policies

The UAGP provides the following policies related to fire protection in the Baseline Developed Area, Downtown Area, and Planned Urbanizing Area: FS-1 through FS-14.

B. CONSIDERATION AND DISCUSSION OF SIGNIFICANT IMPACTS

The following information is provided in accordance with State CEQA Guidelines Section 15126.2.

1. Thresholds of Significance

The proposed General Plan amendment project would have a significant impact relative to increased demand for fire services if it would result in any substantial adverse impact(s) associated with the need for – and/or provision of – new or physically altered fire service facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable response times.

2. Significant Direct Impacts

a. Baseline Developed Area and Downtown Area

The Baseline Developed Area and Downtown Area are already developed. With the implementation of UAGP policies FS-1 through FS-12, any impact(s) resulting from new development regarding fire services in these areas would be less than significant. Implementation of the proposed project would not result in the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives within the existing City.

b. Planned Urbanizing Area

The UAGP would result in the need for additional fire protection services due to increases in the number of employees, permanent population, and associated improvements. The projected planning horizon population and employment of approximately 390,000 and 295,000, respectively, would generate a need for additional fire protection for the increased population and structures as areas within the City develop.

The UAGP planning area includes areas with proposed development for which a six-minute response, a full alarm within ten (10) minutes, and a second full alarm within 15 minutes would not be possible because no fire stations currently exist within an approximately 1.5- to two-mile radius of those areas. Proposed General Plan amendment Policies FS-1 through FS-14 would facilitate adequate fire protection facilities to be in place concurrent with new development in the Planned Urbanizing Area. These policies would be implemented with the adoption of future Specific Plans. Any subsequent impact(s) would be less than significant. Therefore, implementation of the proposed project would not result in the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives.

3. Significant Cumulative Impacts

CEQA and the State CEQA Guidelines require the disclosure of the significant cumulative environmental effects, whether the project would make a cumulatively considerable contribution to any such effects, and, if so, mitigation measures intended to reduce the project's contribution (State CEQA Guidelines Section 15130). A cumulative effect is one that results from past, present, and probable future projects. A project that has a less than significant direct effect on the environment may nonetheless make a considerable contribution to a cumulative effect.

A cumulative impact analysis first identifies whether there exists a cumulatively significant effect in the given resource area. If so, it determines whether the project would make a considerable contribution to that effect. Where a cumulative impact is severe, even a small contribution may be considerable. Where a project is required to implement or fund its fair-share of a mitigation measure designed to alleviate the cumulative impact, its contribution would be rendered less than considerable. (State CEQA Guidelines Section 15130(a))

Cumulative impacts related to fire services are very similar to those described under Direct Impacts, above. Population growth and new development to accommodate it would result in the need for new facilities. There is no identified cumulatively significant effect with regard to fire services. With the implementation of UAGP policies FS-1 through FS-14, any cumulative impacts resulting from new development regarding fire services would be less than significant. Implementation of the proposed project would not result in the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives.

C. POLICIES ADOPTED TO MINIMIZE SIGNIFICANT EFFECTS

The following information is provided in accordance with State CEQA Guidelines Section 15126.4.

1. Policies That Reduce Direct Impacts

The adopted policies of LAFCo and the proposed General Plan amendment (FS-1 through FS-14) would reduce direct impacts by facilitating the provision of adequate fire services concurrent with new development, and by requiring analysis of and mitigation for any potentially significant adverse environmental impacts resulting therefrom.

2. Policies That Reduce Cumulative Impacts

The adopted policies of LAFCo under the Cortese-Knox-Hertzberg Act and proposed General Plan amendment Policies FS-13 and FS-14, would avoid cumulative impacts by facilitating provision of adequate fire services.

D. MONITORING POLICIES THAT REDUCE IMPACTS

The following information is provided in accordance with PRC Section 211081.6. The policies identified in this Master EIR have been drawn from the proposed UAGP amendment, and they are implemented by that plan. City staff provides the City Council with an annual report on UAGP implementation; therefore, no separate mitigation monitoring program is required for the UAGP Master EIR.