

August 19, 2009

Mindy Gentry
Senior Planner
City of Antioch
P.O. Box 5007
Antioch, CA 94531-5007

SUBJECT: Review of Fire Protection Services for Park Ridge EIR Addendum

Dear Mindy,

At the City's request we are providing this updated review of fire protection services for the Park Ridge subdivision. This proposed 525-lot subdivision is located south of Laurel Road and west of the State Route 4 Bypass within the East Lone Tree Specific Plan Area (FUA #2). Park Ridge is the subject of a January 2009 draft Addendum to the certified EIR for the Specific Plan.

As provided for in Section 15164 of the CEQA Guidelines, an Addendum to the previous EIR was prepared for this project because none of conditions identified under Section 15162 were found to apply to the current project or the environmental context under which it is to be implemented (see Addendum pages 5-6 for additional details). As discussed in the Addendum, we have concluded that the proposed project is in substantial conformity with the adopted Specific Plan and the Antioch General Plan, would not introduce any new significant environmental effects, and would not increase the severity of previously identified environmental effects. We also concluded that there are no substantial changes in the circumstances under which the project would be carried out.

Regarding fire protection services, a review of project size, scope, land uses and design was completed, and the access routes serving the project (including project phasing) were examined to confirm consistency with the conclusion of *no significant effect* reached in the original EIR. The northwest project entry (on Laurel Road) is located 1.1 roadway miles from the nearest operational fire station (Station 88) located at 4288 Folsom Drive (at the corner of Wild Horse Road). The most distant southeast corner of the project site is situated 2.0 roadway miles from the station. Station 88 was built in 1996 and has recently been rated to be in "good" overall condition, and is staffed with one captain, one engineer and one firefighter¹.

¹ Documentation on fire stations and response times obtained from *Municipal Service Review: Fire and Emergency Medical Service Providers*, accepted by Contra Costa LAFCO August 12, 2009.

As in the case of all four stations currently serving the City of Antioch, Station 88 is operated by the Contra Costa County Fire Protection District (ConFire). Con Fire is by far the largest fire protection district in the County, with a current total of 351 full-time sworn personnel and 28 staffed stations. ConFire is governed by the Contra Costa County Board of Supervisors, which also has direct control over the East Contra Costa Fire Protection District and the Crockett-Carquinez FPD. All three districts operate under mutual aid agreements for combined assistance in emergencies.

Section III.H. of the original project-level EIR identified the ConFire as the service provider for the Specific Plan area. As discussed on page 115 of the DEIR, Station 88 was identified as the first-response station for the Specific Plan area. Originally located on Deerfield Drive, the station was in the process of being relocated to its current Wild Horse Road / Folsom Drive location at the time the DEIR was published. The DEIR confirms that Antioch Stations 82 and 83 would also respond in an emergency within the Specific Plan area, including the current Park Ridge project site. Originally located further north near State Route 4, Station 82 was also in the process of being relocated as of the DEIR writing to its current site at 196 Bluerock Drive (west of the Specific Plan area). Station 83 remains at its original location further to the west at 2717 Gentrytown Drive.

ConFire's requirement for collection of an impact fee on all new development was in place at the time the DEIR was published, and applicable to projects within the Specific Plan area. The fee is intended to provide for the construction of new fire stations over time. The amount of the fee in effect at the time of the DEIR circulation was \$235 per residential unit. Con Fire has subsequently increased this fee to its current level of \$665. Based on the current fee, the proposed Park Ridge project would contribute nearly \$350,000 or 2.8 times as much as originally reported in the DEIR.

The DEIR also identified ConFire's standard in effect at the time the DEIR was circulated, for first-response engine company facilities to be situated within approximately 1.5 miles of service response areas. As noted above, the Park Ridge project is situated within the northerly portion of the Specific Plan area within a range of 1.1 to 2.0 miles from Station 88. Current NFPA guidelines call for career fire departments to respond within six minutes 90 percent of the time, with the response time including three components: (a) dispatch time of no more than one minute; (b) turn-out time of no more than one minute; and (c) travel time of no more than four minutes². The response time for emergency medical calls, as established by the Contra Costa County EMS Agency (LEMSA) is 7.5 minutes 90 percent of the time.

ConFire's adopted goal is to respond to emergency calls within 5 minutes, 90 percent of the time (excluding dispatch time). This goal is consistent with Contra Costa County's policy,

² Response time information obtained from *Municipal Service Review: Fire and Emergency Medical Service Providers*, accepted by Contra Costa LAFCO August 12, 2009.

and is stricter than the Antioch General Plan Performance Standard (Policy 5.5.2.2) of 5 minutes 80% of the time. ConFire's average district-wide reported 90th percentile response time in 2007, excluding dispatch, was 8 minutes and 30 seconds. The reported median response time, excluding dispatch³, was 5 minutes and 23 seconds. Based on an average travel speed of 25 MPH over local streets, travel time from Station 88 to the Park Ridge project would range from 2 minutes and 43 seconds to four minutes and 52 seconds (excluding dispatch time). This range (reflecting the distance between the opposite corners of the project site) falls within the District's reported average experience, and also achieves the District and City goals.

A fifth station was contemplated in Antioch at the time the DEIR was circulated, with funding to be accumulated through impact fees. The Specific Plan originally identified a site at the northwest corner of Lone Tree Way and Sand Creek Road (renamed Heidorn Ranch Road) for such a station. It has been reported⁴ that the actual location of this future station may shift further to the south in order to concurrently serve Future Urbanization Area #1. ConFire engages in growth planning through its development impact fee nexus study (20-year planning horizon) and five-year capital improvement plan. The District reports that it will be preparing an update to its Strategic Plan in 2009, and anticipates that the new station will be needed to address projected long-term population growth in southeast Antioch. The District also plans to add engine companies to existing stations and to continue relocating stations on a District-wide basis in order to maintain service levels.

In summary, the Park Ridge project was originally anticipated to receive first-response service from Station 88 located 1.1 miles north of the project's westerly entrance on Laurel Road. This station will be able to provide service to Park Ridge consistent with both the City and District service goals and the reported 2007 ConFire median and 90th percentile performance experiences. The project will be obligated to provide impact fees to contribute to the cost of building an additional station within the area that will enable the District to continue to meet service standards over time. Consequently, the project would continue to have a less-than-significant impact on the delivery of fire and emergency services through ConFire.

Sincerely,



Richard T. Loewke, AICP

³ Dispatch time, as reported in *Municipal Service Review: Fire and Emergency Medical Service Providers*, averaged 1 minute and 12 seconds for ConFire in 2007, while the 90th percentile dispatch time was 2 minutes and 12 seconds.

⁴ July 29, 2009 memo from Ted Leach of ConFire, indicating the new station is proposed near the future intersection of Deer Valley Road/Sand Creek Road, to be completed prior to the issuance of a building permit for the 250th home/living unit within FUA #1 (consistent with the Sand Creek Specific Plan).