5.12 Public Services

5.12.1 INTRODUCTION

This section describes the existing fire protection, police protection, and schools that serve the Project site and vicinity and evaluates the potential for implementation of the Project to result in an impact. This section of the EIR addresses whether there are physical environmental effects of new or expanded facilities that are necessary to maintain acceptable service levels related to fire, police, and school services. Because CEQA focuses on physical environmental effects, this section analyzes whether any physical changes resulting from an increase in service demands from development pursuant to the proposed Project could result in significant adverse environmental effects. Thus, an increase in staffing associated with public services, an increase in calls for services, would not, by itself, be considered a physical change in the environment. However, physical changes in the environment resulting from the construction of new facilities or an expansion of existing facilities to accommodate the increased staff or equipment needs resulting from the Project could constitute a significant impact.

5.12.2 FIRE PROTECTION SERVICES

5.12.2.1 FIRE PROTECTION REGULATORY SETTING

California Fire Code

State fire regulations are set forth in Sections 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in Title 24, Part 9 of the California Code of Regulations, the California Building Code), fire protection and notification systems, fire protection devices (such as extinguishers and smoke alarms), building evacuation and access standards, and fire suppression training.

California Health and Safety Code

Additional State fire regulations are set forth in Sections 13000 et seq. of the California Health and Safety Code, which includes regulations for building standards, fire protection and notification systems, fire protection devices such as extinguishers, smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

California Occupational Safety and Health Administration

In accordance with the California Code of Regulations, Title 8 Sections 1270 "Fire Prevention" and 6773 "Fire Protection and Fire Fighting Equipment," California Occupational Safety and Health Administration (Cal/OSHA) has established minimum standards for fire suppression and emergency medical services. The standards include, but are not limited to, guidelines on the handling of highly combustible materials, fire house sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance, and use of all firefighting and emergency medical equipment.

Orange County Fire Authority Fire Prevention Guideline B-09, Fire Master Plans for Commercial and Residential Development

The Orange County Fire Authority (OCFA) Fire Prevention Guideline B-09 requires new structures to meet standards related to access driveways, siting of hydrants, water supply, and building access, as required by the California Fire Code. The guideline requires specific information be provided during the submittal of plans for development projects to demonstrate compliance with all codes and other regulations governing

water availability for firefighting and emergency access to sites and structures within the jurisdictions served by the OCFA. In addition, the guideline requires that plans be reviewed by the OCFA.

City of Santa Ana Municipal Code

Chapter 14; Fire Code. The Santa Ana Municipal Code includes the California Fire Code as published by the California Building Standards Commission and the International Code Council (with some City-specific amendments). The California Fire Code is Title 24, Part 9 of the California Code of Regulations, and regulates new structures, alterations, additions, changes in use or changes in structures. The Code includes specific information regarding safety provisions, emergency planning, fire-resistant construction, fire protection systems, means of egress and hazardous materials.

Fire Facilities Fee. Chapter 8-46 of the Santa Ana Municipal Code requires a fire facilities fee be paid prior to the issuance of building permit for construction of buildings exceeding 2 stories in height (excluding parking structures). Buildings over 2 stories in height require unique firefighting equipment and fire station configurations. The purpose of the fire facilities fee is to provide revenue to pay for equipment needed to fight fires in buildings over 2 stories in height and to improve fire stations in the city as necessary to accommodate such equipment and otherwise augment the City's capability to fight fires in such buildings. All fire facility fee revenues shall be deposited in an account separate and apart from other city revenues and may be expended from such solely to pay for the cost of the facilities identified in Chapter 8-46 of the Municipal Code.

City of Santa Ana General Plan

The City is currently undergoing a comprehensive update to the General Plan. The existing Public Safety Element of the Santa Ana General Plan includes the following public safety objectives and policies are related to fire protection and the proposed Project.

Goal 2: Minimize loss of life and property due to natural and man-made catastrophes.

Objective 2.1: Maintain an effective emergency preparedness plan and program.

Policy: Assure minimum feasible response time to fire calls in all areas of the City. Strictly enforce safety provisions of building and zoning codes.

5.12.2.2 FIRE PROTECTION SERVICE ENVIRONMENTAL SETTING

Fire protection and emergency medical services in the City of Santa Ana are provided by the OCFA through a contract for services. The OCFA provides fire suppression, emergency medical, rescue, fire prevention, hazardous materials coordination, and wildland management services. OCFA serves 23 cities in Orange County and all unincorporated areas. Within the City of Santa Ana, OCFA provides services from 10 city-owned fire stations. There are currently 6 city-owned fire stations located within 3.5 miles of the Project site. Station 79, which is located 1 mile from the Project site is the first responding unit. The location, equipment, and staffing of the fire stations near the Project site are provided in Table 5.12-1.

As provided by the OCFA 2018 Statistical Annual Report, there were 33,983 calls for service from the 10 fire stations in the City in 2018. Of the calls for service, 65 percent (21,952) were for emergency medical calls, 1.7 percent (565) were for fire incidents, and 13.8 percent (4,703) were for other incidents, which includes: cancelled service calls, ruptures, hazardous conditions, false alarms, and miscellaneous calls.

OCFA's Standard of Cover for fire services in urban areas, such as the City of Santa Ana, are listed below. Response times are from receipt of the service call to a unit on scene:

- First-in engines should arrive on-scene to medical aids and/or fires within 7 minutes and 20 seconds 80 percent of the time.
- First-in truck companies should arrive on-scene to fires within 12 minutes 80 percent of the time.
- First-in paramedic companies should arrive on-scene at all medical aids within 10 minutes 80 percent of the time.

Table 5.12-1: Santa Ana Fire Stations Near the Project Site

Fire Station	Location	Distance from Site	Equipment	Staffing
Station 79	1320 East Warner	1 mile	1 Paramedic Engine	1 Fire Captain, 1 Engineer, 2 Firefighters
Station 37	15011 Kensington Park Avenue	1.8 miles	1 Paramedic Engine	1 Fire Captain, 1 Engineer, 2 Firefighters
Station 6	3180 Barranca Parkway	2.2 miles	1 Paramedic Engine	1 Fire Captain, 1 Engineer, 2 Firefighters
Station 28	17862 Gillette Avenue	2.5 miles	1 Paramedic Engine, 1 Paramedic Truck	2 Fire Captain, 2 Engineer, 4 Firefighters
Station 74	1427 S. Broadway Street	2.8 miles	1 Paramedic Engine	1 Fire Captain, 1 Engineer, 2 Firefighters
Station 76	950 W. MacArthur Boulevard	3.5 miles	1 Paramedic Truck	1 Fire Captain, 1 Engineer, 2 Firefighters

Source: OCFA 2019.

Station 79, which is located 1 mile from the Project is the first responding station to the site. In 2018, Station 79 had 1,995 incidents in its first response area with an on-scene response time of 7:42 minutes, 80 percent of the time. Station 37, which is the 2nd responding station at 1.8 miles from the Project site had 1,656 incidents in its first response area in 2018 with an on-scene response time of 8:12 minutes, 80 percent of the time.

5.12.2.3 FIRE PROTECTION SERVICE THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to result in substantial adverse physical impacts associated with the provision 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.

5.12.2.4 FIRE PROTECTION SERVICE METHODOLOGY

The potential impacts related to fire protection services were evaluated based on the ability of existing fire department staffing, equipment, and facilities to meet the additional demand for fire protection and emergency medical services resulting from implementation of the Project. Impacts are considered significant if implementation of the proposed Project would result in inadequate staffing levels, response times, and/or increased demand for services that would require the construction or expansion of new or altered facilities that might have an adverse physical effect on the environment. For fire services, a significant impact could occur if the proposed Project generated the need for additional personnel or equipment that could not be

accommodated within the existing stations and would require the construction of a new station or an expansion of an existing station.

5.12.2.5 FIRE PROTECTION SERVICE ENVIRONMENTAL IMPACTS

IMPACT PS-1: THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE PROVISION OF NEW OR PHYSICALLY ALTERED FIRE SERVICE FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS, IN ORDER TO MAINTAIN ACCEPTABLE SERVICE RATIOS AND RESPONSE TIMES OR OTHER PERFORMANCE OBJECTIVES FOR FIRE PROTECTION SERVICES.

Less than Significant. The proposed Project would remove the existing industrial buildings and develop 1,150 multi-family residences within four building structures and 80,000 square feet of commercial retail and restaurant uses. Construction and operation of the proposed Project would increase demands for fire protection and emergency medical services over the existing site condition. As described in Section 5.11, *Population and Housing*, the proposed Project is anticipated to result in 2,081 residents and 320 employees at full occupancy. This residential and employee population is expected to create the typical range of service calls to OCFA that are largely related to medical emergencies, which consist of 65 percent of service calls; while fire calls consisted of 1.7 percent of OCFA service calls in Santa Ana during 2018.

As described above in the Existing Setting Section, there are 6 existing fire stations within 3.5 miles of the Project site; and the existing average on-scene response time for emergency calls from the first responding unit (Station 79) that is 1 mile from the Project site is 7:42 minutes, 80 percent of the time, which slightly exceeds the Standard of Cover of 7:20, 80 percent of the time. The existing average response time for emergency calls from the second responding unit (Station 37) that is 1.8 miles from the Project site is 8:12 minutes, 80 percent of the time, which also exceeds the Standard of Cover.

The calls for service from the additional population at the Project site could result in an increase in response times, further exceeding the Standard of Cover, if the calls coincide with other calls for service. However, fire protection equipment and staffing can be augmented by the City as needed (with assistance from revenue provided by the Project and the fire facilities fee required per Chapter 8-46 of the Municipal Code) to expand fire protection and emergency medical staffing and equipment provided from existing stations and better accommodate simultaneous service calls.

Because the Project site is within 3.5 miles of 6 existing fire stations and the Project site is within a developed area that is currently served by these stations, the Project would not result in the requirement to construct a new fire station. In addition, Chapter 8-46 of the Santa Ana Municipal Code requires a fire facilities fee be paid prior to the issuance of building permit for construction of buildings exceeding 2 stories in height, such as the proposed Project. The purpose of the fire facilities fee is to improve fire stations in the City and provide revenue for equipment needed to fight fires in buildings over 2 stories in height. The proposed Project would be required to provide funding to assist in improvement of existing fire facilities and provision of needed equipment.

Additionally, the proposed Project would remove the existing buildings, which were constructed pursuant to fire code standards of 1979 and 1981 and develop new building structures pursuant to the most recent California building and fire codes, which would improve the structural fire safety over the existing buildings. California's building/fire codes are published in their entirety every three years and were most recently updated in 2019. As all projects within the City, the proposed Project would be required per City permitting to comply with existing regulations, including the Santa Ana Fire Code and the OCFA Fire Prevention

Guideline B-09, Fire Master Plans for Commercial and Residential Development, which include regulations for water supply, built in fire protection systems, adequate emergency access, fire hydrant availability, and fire-safe building materials, such as the following:

- Structures would have automatic fire sprinkler systems per National Fire Protection Association Standard for the Installation of Sprinkler Systems (NFPA 13) as required by the California Building and Fire Codes
- A fire alarm system would be installed per the requirements of the California Fire Code
- Access to and around structures would meet OCFA and California Fire Code requirements
- A water supply system to supply fire hydrants and fire hydrant spacing would meet OCFA and California Fire Code requirements
- Turning radius and access in and around the Project site and buildings would be designed to accommodate large fire department vehicles and their weight per OCFA Fire Prevention Guideline B-09
- All electrically operated gates shall install emergency opening devices as approved by the OCFA
- High rise provisions would be required for buildings over 75 feet high and the parking structure
- The amenity decks are an Assembly Occupancy and proper egress provisions are required
- Occupancy permits are required prior to occupancy of any part of the Project

Overall, with the 6 existing fire stations within 3.5 miles of the Project site, the area has adequate nearby fire facilities to serve the proposed Project in addition to the existing service needs of the area; and construction of a new or expanded fire station would not be required as a result of the proposed Project. Thus, the Project would not result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered fire protection facilities. Also, existing fire protection facilities and staffing could be augmented as needed (with assistance from revenue provided by the Project and the fire facilities fee required prior to the issuance of building permits per Chapter 8-46 of the Municipal Code) to expand fire protection and emergency medical staffing and equipment provided from existing stations. Therefore, impacts related to fire protection services would be less than significant.

5.12.2.6 FIRE PROTECTION SERVICE CUMULATIVE IMPACTS

The geographic context for cumulative fire protection and emergency services is the OCFA service area within the City of Santa Ana because the City owns and maintains the 10 existing fire stations within the City. Staffing of the fire stations is done through contracting with OCFA. Thus, augmenting the existing fire station facilities, equipment, and staffing is under the jurisdiction of the City. As shown in Table 5-1 and Figure 5-1 there five proposed projects within Santa Ana in the Project vicinity that would combine to generate additional demands for OCFA services near the site. Three of the five other projects are similar multi-family housing developments; one is a hotel development, and the other is an industrial project. Like the proposed Project, these related projects involve redevelopment of existing lands and the projects would be reviewed by City and OCFA staff prior to permit approval to ensure that the projects implement fire protection design features per California building and fire code regulations that would reduce potential fire hazards. Cumulative increased demands for services would also be offset by the City of Santa Ana fire facilities fee that is required for each city development project.

Because 6 of the City's 10 existing fire stations are located within 3.5 miles of the Project site, and related projects would be subject to the same impact fees that provide funding for additional equipment and staffing, and fire safe construction requirements, impacts related to fire services from the proposed Project would not combine with other related projects to result in a cumulative impact related to the need for new or physically altered fire service facilities. Therefore, cumulative impacts associated with fire services would be less than cumulatively considerable.

5.12.2.7 FIRE PROTECTION SERVICE EXISTING STANDARD CONDITIONS AND PLANS, PROGRAMS OR POLICIES

The following standard regulation would reduce potential impacts related to fire protection services:

- OCFA Fire Prevention Guideline B-09, Fire Master Plans for Commercial and Residential Development
- Santa Ana Municipal Code Chapter 14; Fire Code
- Santa Ana Municipal Code Chapter 8-46; Fire Facilities Fee

5.12.2.8 FIRE PROTECTION SERVICE LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impact PS-1 would be less than significant

5.12.2.9 FIRE PROTECTION SERVICE MITIGATION MEASURES

No mitigation measures are required.

5.12.2.10 FIRE PROTECTION SERVICE LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant unavoidable adverse impacts related to fire protection services would occur.

5.12.3 POLICE SERVICES

5.12.3.1 POLICE SERVICES REGULATORY SETTING

City of Santa Ana General Plan

The City is currently undergoing a comprehensive update to the General Plan. The existing Public Safety Element of the Santa Ana General Plan includes the following public safety objectives and policies are related to police services and the proposed Project.

Goal 1: Preserve a safe and secure environment for all Santa Ana residents.

Policies:

- Maintain or increase the level of local law enforcement activity.
- Assure minimum feasible response time to police calls in all areas of the City.
- Increase the effectiveness of law enforcement activities through expansion of crime prevention measures and the active involvement of the public in local law enforcement programs.

5.12.3.2 POLICE SERVICES ENVIRONMENTAL SETTING

The Santa Ana Police Department provides police services throughout the City, including the Project area. The Police Department headquarters is located west of City Hall (60 Civic Center Plaza), which is

approximately 4.7 miles northwest of the Project site. The Police Department also has a Southeast Substation located at 1780 East McFadden Avenue, which is approximately 2.2 miles from the Project site; and a Westend Substation located at 3750 West McFadden Avenue, which is 6.4 miles from the Project site. The Police Department has divided the City into two policing divisions; East and West. These are further divided into four districts overseen by two District Commanders. The Project site is located within the Southeast District, which consists of the City of Santa Ana lands that are south of First Street and east of Flower Street.

In 2018, the Santa Ana Police Department had 565 personnel, which included 316 sworn and 249 non-sworn positions. Based on the California Department of Finance estimate that 339,192 residents lived within the City in 2018, the City's sworn officer to population ratio is 1.07 officers per 1,000 population.

In 2018, officers responded to 125,681 calls for service and initiated 48,365 policing activities, which totals 174,046 policing activities. Within 2018, the Police Department had the following responses times per service call priority:

- Priority One – 8 minutes 10 seconds
- Priority Two – 11 minutes 21 seconds
- Priority Three – 31 minutes 46 seconds
- Priority Four – 35 minutes 56 seconds
- Priority Five – 47 minutes 39 seconds

5.12.3.3 POLICE SERVICES THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to result in substantial adverse physical impacts associated with the provision of new or physically altered police department 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 services.

5.12.3.4 POLICE SERVICES METHODOLOGY

The potential impacts related to police services were evaluated based on the ability of existing and planned police department staffing, equipment, and facilities to meet the additional demand for police services resulting from implementation of the Project. Impacts are considered significant if implementation of the proposed Project would result in inadequate staffing levels, response times, and/or increased demand for services that would require the construction or expansion of new or altered facilities that might have an adverse physical effect on the environment. For police services, a significant impact could occur if the proposed Project generated the need for additional personnel or equipment that could not be accommodated within the existing station and substations and would require the construction of a new station or an expansion of an existing station.

5.12.3.5 POLICE SERVICES ENVIRONMENTAL IMPACTS

IMPACT PS-2 THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE PROVISION OF NEW OR PHYSICALLY ALTERED POLICE SERVICE FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS, IN ORDER TO MAINTAIN ACCEPTABLE SERVICE RATIOS AND RESPONSE TIMES OR OTHER PERFORMANCE OBJECTIVES FOR POLCEERVICES.

Less than Significant. The proposed Project would result in an onsite population that would create the need for new police services. During the construction and operation of the Project, the need for police services is expected to grow due to the potential for additional crime and accidents. Crime and safety issues during

Project construction may include: theft of building materials and construction equipment, malicious mischief, graffiti, and vandalism. During operation, the proposed Project is anticipated to generate a typical range of police service calls, such as vehicle burglaries, residential thefts, commercial shoplifting, and disturbances. The proposed Project addresses typical residential security concerns by providing low-intensity security lighting, security cameras, electronic access to buildings, and 24-hour security personnel. Pursuant to the City's existing permitting process, the Police Department would review and approve the final site plans to ensure that the City's Crime Prevention through Environmental Design measures are incorporated appropriately to provide a safe environment.

The proposed Project would result in an incremental increase in demands on law enforcement services but would not be significant when compared to the current demand levels. As described previously, the residential population of the Project site at full occupancy would be approximately 2,081 residents and based on the Police Department's 2018 staffing of 1.07 officers per thousand population, the proposed Project would require two additional officers, which could be located at the Southeast Substation that is 2.2 miles from the proposed Project and within response distance. Typical police operations deploy coverage to be able to respond to calls from services throughout the area.

With these additional personnel, law enforcement personnel are anticipated to be able to respond in a timely manner to emergency calls in the Project area. Providing adequate police personnel is part of the City's annual budgetary process, and it is always the City's priority to provide adequate police officers. The addition of two additional officers on patrol would not require the construction or expansion of the City's existing policing facilities. Therefore, the proposed Project would not result in the need for, new or physically altered police protection facilities. Thus, substantial adverse physical impacts associated with the provision of new or expanded facilities would not occur. Thus, impacts are less than significant.

5.12.3.6 POLICE SERVICES CUMULATIVE IMPACTS

The geographic context for cumulative police services is the area served by the City of Santa Ana Police Department. As described above, the Project would result in an incremental increase in demands on law enforcement services and based on the Police Department's 2018 staffing of 1.07 officers per thousand population, the proposed Project would require a minimum of two additional officers.

Table 5-1 lists 9 projects within the Police Department's Southeast District (shown in Figure 5-1) and would be served by the same Police Department patrol staffing. These projects include 3,652 multi-family residential units and one hotel. Based on the average persons per household estimated for the proposed Project, the 3,652 residential units would result in approximately 6,574 residents, which would require an additional 7 officers to maintain the City's existing officers to population ratio. The addition of two officers from the proposed Project and 7 officers from the other projects within the Police Department's Southeast District would not require the need for, new or physically altered police protection facilities. These new officers would be added to the Police Department staffing, and not working at the same time and would be in the field and on patrol.

The expansion of police services are funded by business taxes, property taxes, sales taxes, and utility users' taxes that are generated by each development within the City. Additional Police Department personnel and associated equipment are provided through City's the annual budget review process. Due to the limited number of officers that would be needed to serve the cumulative projects, and because the Project would generate fees for future needed Police Department personnel and equipment, the law enforcement service related impacts from the proposed Project would not combine with other related projects to result in a cumulatively considerable impact. The proposed Project in addition to the related projects would not result

in a need to expand or provide new police facilities, which could result in a significant environmental effect. Therefore, cumulative impacts associated with police services would be less than significant.

5.12.3.7 POLICE SERVICES EXISTING STANDARD CONDITIONS AND PLANS, PROGRAMS OR POLICIES

There are no applicable regulations related to police services that would reduce potential impacts.

5.12.3.8 POLICE SERVICES LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impact PS-2 would be less than significant.

5.12.3.9 POLICE SERVICES MITIGATION MEASURES

No mitigation measures are required.

5.12.3.10 POLICE SERVICES LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant unavoidable adverse impacts related to police services would occur.

5.12.4 SCHOOL SERVICES

5.12.4.1 SCHOOL SERVICES REGULATORY SETTING

California State Assembly Bill 2926: School Facilities Act of 1986
In 1986, AB 2926 was enacted to authorize the levy of statutory fees on new residential and commercial/industrial development in order to pay for school facilities. AB 2926 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 statutory fees by developers serves as CEQA mitigation to satisfy the impact of development on school facilities.

California Senate Bill 50
The passage of SB 50 in 1998 defined the needs analysis process that is codified in Government Code Sections 65995.5 through 65998. Under the provisions of SB 50, school districts may collect fees to offset the costs associated with increasing school capacity as a result of development. 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 other half. Level III fees require the developer to pay the full cost of accommodating the students in new schools and are implemented at the time the funds available from Proposition 1A (approved by the voters in 1998) are expended. School districts must demonstrate to the state their long-term facilities needs and costs based on long-term population growth in order to qualify for this source of funding.

5.12.4.2 SCHOOL SERVICES ENVIRONMENTAL SETTING

The Project site is located within the Santa Ana Unified School District (SAUSD) boundary, which serves a 24 square mile area and has a total of 57 schools, including: thirty-six elementary schools, nine intermediate schools, and six high schools, three educational options secondary schools, two early college high schools, and one special needs development center (SAUSD 2019).

Santa Ana Unified School District's school facilities has an enrollment of 51,482 students in the 2018/2019 school year (CDE 2019). The Project site is in the attendance areas of James Monroe Elementary School (417 E. Central Ave), which is approximately 1.8 miles from the Project site; McFadden Intermediate (2701 S. Raitt Street), which is approximately 3.8 miles from the Project site; and Century High School (1401 S. Grand Avenue), which is approximately 1.8 miles from the Project site (SAUSD 2019). Table 5.12-2 shows the total capacity, the 2018-2019 school year enrollments, and the remaining capacity of the schools that would serve students residing on the Project site. As shown on Table 5.12-2, each of the schools have remaining capacity to serve between 275 and 986 additional students.

Table 5.12-2: Existing School Capacity of Schools Serving the Project Site

School	Total Capacity	2018-19 Enrollment	Remaining Capacity
James Monroe Elementary	*575*	300	*275*
McFadden Intermediate	1,512	1,184	328
Century High	2,646	1,660	986
Total	**4,733**	**3,144**	**1,589**

Sources: cde.ca.gov and SAUSD Facilities Master Plan

5.12.4.3 SCHOOL SERVICES THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to result in substantial adverse physical impacts associated with the provision of new or physically altered school 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 services.

5.12.4.4 SCHOOL SERVICES METHODOLOGY

The potential impacts related to school services were evaluated based on the ability of existing and planned schools to accommodate the student population that would be generated by the proposed Project. Specifically, impacts on schools are determined by analyzing the estimated increase in student population as a result of Project build out and comparing the increase to the capacity of schools that would serve the Project site to determine whether new or altered facilities would be required, the construction of which could result in adverse environmental effects.

5.12.4.5 SCHOOL SERVICE ENVIRONMENTAL IMPACTS

IMPACT PS-3 THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE PROVISION OF NEW OR PHYSICALLY ALTERED SCHOOL FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS.

Less than Significant. The proposed Project would develop 1,150 residential units, which would provide housing for families that have school children. For planning purposes, student generation by number of dwelling units proposed by the Project area were determined using the estimates from the Heritage Mixed Use Project Draft EIR, which was prepared in 2015 and determined using student generation rates from the U.S. Census Bureau, American Community Survey Public Use Microdata Sample data for students per household by rental unit type (rented single family homes, multi-family rental units and other rental units), which determined that comparable rental projects in Tustin, Irvine, Costa Mesa and Santa Ana have a student per household ratio of 0.29 for occupied multi-family rental units.

Based on a student per household ratio of 0.29, which is market area average, the proposed Project would result in 334 students at full occupancy, which is approximately 16 percent of the total 2,081 residents at full occupancy. As shown in 5.12-2, the remaining school capacity in the school facilities that would serve the Project have a total remaining capacity for 1,589, which consists of 275 spaces in James Monroe Elementary School, 328 spaces in McFadden Intermediate School, and 986 spaces in Century High School. As the school children on site would range from kindergarten through 12th grade, with full occupancy of the proposed Project, the schools serving the Project site would be able to accommodate the student from the site and continue to have capacity to serve additional students.

In addition, as described within the Regulatory Setting, the need for additional school facilities is addressed through compliance with school impact fee assessment. SB 50 (Chapter 407 of Statutes of 1998) sets forth a state school facilities construction program that includes restrictions on a local jurisdiction's ability to condition a project on mitigation of a project's impacts on school facilities in excess of fees set forth in the Government Code. These fees are collected by school districts at the time of issuance of building permits for commercial, industrial, and residential projects. The existing Santa Ana Unified School District development impact fee is $3.79 per square foot for all new residential development, and $0.61 per square foot for new commercial development. Pursuant to Government Code Section 65995 applicants shall pay developer fees to the appropriate school districts at the time building permits are issued; and payment of the adopted fees provides full and complete mitigation of school impacts. As a result, impacts related to school facilities would be less than significant with the Government Code required fee payments.

5.12.4.6 SCHOOL SERVICES CUMULATIVE IMPACTS

The geographic context for cumulative impacts to schools is the Santa Ana Unified School District boundaries. The Project and other development within the Santa Ana Unified School District could generate additional students resulting in the need to expand or construct new schools. As described above, the Project would generate approximately 334 additional students that would be accommodated by the existing schools with additional capacity available for cumulative projects.

The attendance boundaries of Monroe Elementary, McFadden Intermediate, Century High School include portions of the City of Santa Ana and Irvine. Both cities are currently anticipating several multi-family residential development projects that are anticipated to generate additional students within the attendance boundaries of these schools. Thus, the proposed Project in combination with related projects would result in the exceedance of capacity at one or more of these facilities. Some of the existing and/or future students could transfer to other schools within the school district that have some capacity; however, one or more school facilities within the Santa Ana Unified School District are likely to be over capacity with implementation of the proposed Project in combination with related projects.

However, as described above, the state provided authority for school districts to assess impact fees for both residential and non-residential development projects. Fees collected in accordance with Government Code Section 65995(b) allow the Santa Ana Unified School District to plan and construct for future growth. Furthermore, the payment of those fees constitutes full mitigation for the impacts generated by new development, per Government Code Section 65995, which would reduce potential impacts related to the projects cumulative school service impacts to a less than significant level.

5.12.4.7 SCHOOL SERVICES EXISTING STANDARD CONDITIONS AND PLANS, PROGRAMS OR POLICIES

- Government Code Section 65995(b)

5.12.4.8 SCHOOL SERVICES LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impact PS-3 would be less than significant

5.12.4.9 SCHOOL SERVICES MITIGATION MEASURES

No mitigation measures are required.

5.12.4.10 SCHOOL SERVICES LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant unavoidable adverse impacts related to school services would occur.

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