

5. Environmental Analysis

5.12 PUBLIC SERVICES

This section of the Draft Environmental Impact Report (DEIR) addresses public services, including fire protection and emergency services, police protection, and school services. Utilities and service systems, including water, wastewater, and solid waste services and systems, are addressed in Section 5.15, *Utilities and Service Systems*.

The Initial Study, included as Appendix A, substantiates that impacts associated with public services would be less than significant for parks and libraries. These topics are not addressed in the following analysis.

5.12.1 Fire Protection and Emergency Services

5.12.1.1 ENVIRONMENTAL SETTING

Regulatory Background

California Fire Code

The California Fire Code (California Code of Regulations Title 24, Part 9) is published every three years by order of the California legislature, with supplements published in intervening years. A city, county, or city and county may establish more restrictive building standards reasonably necessary because of local climatic, geological, or topographical conditions. It provides an enforceable set of regulations for the safeguarding of life and property from fire and explosion hazards arising from the storage, handling, and use of hazardous substances, materials, and devices and from conditions hazardous to life or property in the occupancy of buildings and premises.

City of Anaheim

City of Anaheim General Plan

Anaheim Fire and Rescue provides fire protection services and emergency rescue and medical services. The City has the following goal and policies concerning fire and emergency safety.

Goal 1.1. Provide sufficient staffing, equipment and facilities to ensure effective fire protection, emergency medical and rescue services, permitting and fire inspection, and hazardous material response services that keep pace with growth.

Policy 1. Maintain adequate resources to enable the Fire Department to meet response time standards, keep pace with growth, and provide high levels of service.

Policy 2. Maintain adequate fire training facilities, equipment, and programs for firefighting and inspection personnel and educational programs for the general public, including fire safety and prevention and emergency medical-related information.

Policy 3. Maintain and/or upgrade water facilities to ensure adequate response to fire hazards.

5. Environmental Analysis

PUBLIC SERVICES

Municipal Code Title 16 Fire

The City of Anaheim adopted the 2016 edition of the California Fire Code and incorporated by reference the 2015 International Fire Code.

Anaheim Fire and Rescue Strategic Plan 2015–2020

Anaheim Fire and Rescue Strategic Plan 2015–2020 includes strategic initiatives, goals, and objectives as well as the costs of recommendations, which would subsequently be incorporated into the annual budget request and department work plan. The following are the five-year recommendations in the strategic plan (AF&R 2015).

1. Maintain agency accreditation status
2. Conduct an Insurance Service Office (ISO) review
3. Install emergency vehicle preemption traffic system on all City traffic signals
4. Development and implement a community risk reduction plan
5. Continue the upgrade of the 800 MHz countywide coordinated communications system
6. Design a plan to implement an integrated mobile health care division
7. Begin the implementation of the capital improvement plan
8. Begin the implementation of the multiyear staffing plan

Existing Conditions

Anaheim Fire and Rescue (AF&R) currently provides fire protection and emergency services to the Project Site. The City holds a “public protection classification rating” awarded by the Insurance Services Office as a Class 2 City for response time, equipment, and community water supply. There are 12 fire stations in the city, and the nearest fire station to the Project Site is Fire Station 9 at 6300 Nohl Ranch Road, approximately 0.9 mile to the northwest. AF&R employs approximately 276 full-time-equivalent personnel, of which approximately 208 are sworn fire suppression personnel (Anaheim 2017). AF&R presently staffs 11 engine companies; 2 paramedic companies assigned to the Disneyland Resort; 3 battalions; and several specialized units. Daily staffing is approximately 66 firefighters per day (AF&R 2019). Stations 10 and 8 can also serve the Project Site and its surrounding area if Station 9 is on another call. Weir Canyon Station 10 is at 8270 E. Monte Vista Road and is the station that is farthest to the east in Anaheim; Riverdale Station 8 is at 4555 East Riverdale Avenue.

AF&R’s benchmark travel time for the first arriving unit is 4 minutes 90 percent of the time. The past five-year aggregate shows AF&R performing at 6 minutes and 5 seconds 90 percent of the time.

5.12.1.2 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

5. Environmental Analysis PUBLIC SERVICES

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.

5.12.1.3 PLANS, PROGRAMS, AND POLICIES

Regulatory Requirements

RR PS-1 The Proposed Project is required to comply with the 2016 Edition of the California Fire Code.

5.12.1.4 ENVIRONMENTAL IMPACTS

Impact Analysis

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

Impact 5.12-1: The Proposed Project would introduce new residential uses to the Project Site, thereby potentially increasing the number of calls for Anaheim Fire and Rescue; however, the Proposed Project would not result in new or expanded fire services facilities that could result in a substantial adverse physical impact. [Threshold FP-1]

The Project Site is a developed neighborhood commercial center and is already served by AF&R. AF&R was consulted and indicated that replacing the commercial uses with 58 residential uses may increase call volumes. Residential uses typically have larger call volumes than. AF&R's benchmark travel time for the first arriving unit is 4 minutes 90 percent of the time. However, this benchmark travel time has not been met as the past five-year aggregate, which shows AF&R performing at 6 minutes and 5 seconds 90 percent of the time. This is a 2 minute and 5 second delay in meeting the benchmark citywide. Implementation of the Proposed Project could affect response time for Station 9 as well as for Stations 8 and 11 as outside stations would need to cover the Station 9 area if Station 9 is engaged. AF&R also has an automatic and mutual contract with neighboring fire agencies. Orange City Fire Department Fire Station 8 is at 5725 Carver Lane, Orange, approximately 1.8 miles to the west.

Development impact fees (DIF) are collected to build and supply necessary infrastructure for fire protection services, and the general fund is used for ongoing staffing cost.

Anaheim Fire and Rescue Strategic Plan 2015–2020 has various strategies to better protect the city from various emergency situations, including medical and fire emergencies. Implementation of various programs in the Strategic Plan, such the Community Risk Reduction (CRR) program and the Ready, Set, Go! program, would promote fire safety and reduce direct impacts to fire protection services. The CRR program advocates preventive measures for single-family and multifamily residences and the wildland urban interface area by reaching out to high-risk populations and delivering proactive services and community education. The Ready, Set, Go! program seeks to develop and improve the dialogue between AF&R and residents by using inspectors and firefighters to teach individuals who live in high-risk wildfire areas how to best prepare themselves and their properties for wildland fire threats.

5. Environmental Analysis

PUBLIC SERVICES

The Strategic Plan also recommended measures to “begin the implementation of the capital improvement plan” and to “begin the implementation of the multi-year staffing plan.” The capital improvement plan included the addition of two new stations, one at La Palma/Euclid area and one at the Platinum Triangle; the retrofit of the La Palma Annex; and the relocation of Station 5 to La Palma/57 freeway area. Although DIF collected from the Proposed Project would not contribute toward these capital improvements—they would be funded through dedicated funding sources (e.g., Platinum Triangle fees and 2015 bond proceeds)—new facilities would have a positive effect on AF&R’s performance. Additional fire personnel and associated facilities and equipment would be provided through the annual operating budget and capital improvement program review process. AF&R’s needs are assessed annually, and budget allocations will be revised accordingly to ensure that adequate levels of service are maintained throughout the city.

Moreover, new buildings would be constructed in accordance with the applicable provisions of the adopted Fire Code, ordinances, and standard conditions regarding fire prevention and suppression measures related to water improvement plans, fire hydrants, fire access, and water availability. Compliance with the applicable fire and building codes and collection of applicable fees would ensure that implementation of the Proposed Project would not result in significant impacts to fire protection services.

Level of Significance Before Mitigation: Less than significant.

5.12.1.5 CUMULATIVE IMPACTS

The Proposed Project would increase the demands for fire protection services individually, and combined with other projects in the City, would incrementally cause cumulative impacts. However, additional fire personnel and associated facilities and equipment would be provided through the annual operating budget and capital improvement program review process that would evaluate not only the Proposed Project but other projects in the city. This periodic review process would ensure adequate service throughout the city, and no significant cumulative impact is anticipated.

Level of Significance Before Mitigation: Less than significant.

5.12.1.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements and standard conditions of approval, the following impacts would be less than significant: 5.12-1.

5.12.1.7 MITIGATION MEASURES

No mitigation measure is required.

5.12.1.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant unavoidable adverse impacts relating to fire protection have been identified.

5. Environmental Analysis PUBLIC SERVICES

5.12.2 Police Protection

5.12.2.1 ENVIRONMENTAL SETTING

Regulatory Background

City of Anaheim General Plan

The City of Anaheim General Plan includes a goal and policies for police protection services.

Goal 2.1: Meet the community's needs for public safety and law enforcement by ensuring adequate resources for the prevention, detection, and investigation of crime, and response to calls for service. And the following policies to achieve the goal

Policy 1. Maintain adequate resources to enable the Police Department to meet response time standards, keep pace with growth, and provide high levels of service.

Policy 2. Maintain a well-trained, well-equipped police force to meet changing needs and conditions by continually updating and revising public safety techniques and providing for effective evaluation and training of personnel.

Policy 3. Combat crime and increase public safety through community education programs, including active involvement in the Neighborhood Improvement and Neighborhood Watch Programs, and coordinate programs at local schools and other meeting locations.

Existing Conditions

The Project Site is served by the Anaheim Police Department (APD). Police services provided include patrol, investigations, traffic enforcement, traffic control, vice and narcotics enforcement, airborne patrol, crime suppression, community policing, tourist-oriented policing, and detention facilities. APD dispatches all calls for service from the main station (police headquarters) in downtown Anaheim, and patrol units are deployed throughout the City in four geographical policing districts (East, West, Central, and South). The number of officers in each district varies based on the volume of calls and time of day. Anaheim maintains three stations in the city and staffs 385 sworn and 195 civilian professional staff, and 4 reserve officers, for a ratio of 1.1 officer to every 1,000 population.

- **Police Headquarters:** 425 S. Harbor Blvd.
- **East Substation:** 8201 E. Santa Ana Canyon Rd.
- **West Substation:** 320 S. Beach Blvd.

The closest substation to the Project Site is the East Substation, approximately 2.9 miles to the northeast. The police dispatch methods for calls are as follows:

- **Priority One (units dispatched immediately).** If all units are busy, the need for units to clear for an emergency call will be broadcast. If no units clear, the nearest unit from another area will be dispatched.

5. Environmental Analysis

PUBLIC SERVICES

- **Priority Two (units sent immediately, if available).** The goal is to send the beat units so they are aware of the problems in their assigned area. If the area unit is not available, the nearest unit will be dispatched. If no units clear after 5 minutes, the need to clear will again be dispatched. If the call is violent and indicates imminent threat of injury, but no units clear after the second broadcast, the nearest unit will be dispatched.
- **Priority Three:** Calls may be held by dispatch up to 15 minutes. If no units are available after 15 minutes, the dispatcher will send the closest available unit.
- **Priority Four:** Calls may be held up to 1 hour.
- **Priority Five:** Calls may be held up to 2 hours.

In 2016, the average response time for a Priority One call was 8 minutes 52 seconds; Priority Two was 10 minutes 55 seconds; and Priority Three was 35 minutes.

5.12.2.2 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.

5.12.2.3 PLANS, PROGRAMS, AND POLICIES

Project Design Features

- PDF PS-1 The Proposed Project will consult with the Anaheim Police Department crime prevention specialist to review plans to identify any problematic areas where a residence is unprotected and get recommendations in various crime prevention measures.

5.12.2.4 ENVIRONMENTAL IMPACTS

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

Impact 5.12-2: The Proposed Project would not result in substantial adverse physical impacts associated with provision of new or physically altered police facilities, the construction of which could cause environmental impacts, in order to maintain acceptable performance objectives. [Threshold PP-1]

The Project Site is developed as a neighborhood commercial center, and redevelopment of the property into residential uses would not require construction of additional police protection facilities. The Proposed Project

5. Environmental Analysis PUBLIC SERVICES

is of quality design as discussed in Section 5.1 *Aesthetics*, of the Draft EIR, and would not include features that could potentially attract high crime rates. The Proposed Project provides natural surveillance to discourage crimes, such as by providing pedestrian walkway and outdoor lounges along the interior wall of the Project Site. The Project Site also has two street frontages with sidewalks. The Project design also incorporates a ceremonial entry portal with a low wall and hedge to create a clear distinction between public and private property, reinforce private territory, increase sense of ownership, and better identify intruders. The Proposed Project would also have an HOA to provide quality maintenance to create an environment that does not invite vandalism and other crimes.

Police officers patrol within the city's service boundaries, and all calls for service are dispatched from the main station (at 425 S. Harbor Blvd). The ratio of sworn police officers is approximately 1.1 officers per 1,000 population, and the addition of 202 residents (based on 58 units and average household size of 3.47 for Anaheim) would not create police protection demands that could not be handled by the existing APD operation. The Proposed Project would not require construction of additional police facilities to maintain adequate police protection service. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

5.12.2.5 CUMULATIVE IMPACTS

Implementation of the Proposed Project in conjunction with other development in the City would increase the overall police services demands for APD. However, buildout of the Proposed Project along with other City development would occur over an extended period of time, and the actual needs for police protection staff and facilities would be assessed annually with the budget allocation process. The tax revenues generated by cumulative projects in the City would be adequate to maintain safety protection throughout the City. Moreover, no long-lasting adverse physical impacts are anticipated in 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.

5.12.2.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements and standard conditions of approval, the following impacts would be less than significant: 5.12-2.

5.12.2.7 MITIGATION MEASURES

No mitigation measure are required.

5.12.2.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No mitigation measures are required to reduce impacts associated with police protection to a level that is less than significant. Therefore, no significant unavoidable adverse impacts relating to police protection would occur.

5. Environmental Analysis

PUBLIC SERVICES

5.12.3 School Services

5.12.3.1 ENVIRONMENTAL SETTING

Regulatory Background

State Legislation

Senate Bill (SB) 50 sets forth a state school facilities construction program that includes restrictions on a local jurisdiction's ability to require mitigation of a project's impacts on school facilities in excess of fees set forth in Education Code 17620. It establishes three potential limits for school districts, depending on the availability of new school construction funding from the state and the particular needs of the individual school districts. Level one is the general school facilities fees imposed in accordance with Government Code Section 65995, as amended. Level two and three fees are alternate fees that are intended to represent 50 percent or 100 percent of a school district's school facility construction costs per new residential construction, as authorized by Government Code Sections 65995.5, 65995.6, and 65995.7. On January 24, 2018, the State Allocation Board adjusted the maximum level-one residential school fee to \$3.79 per square foot for residential development and \$0.61 per square foot for commercial/industrial projects (Cooperative Strategies 2018).

State legislation, specifically AB 2926, AB 1600, and AB 181, provides guidelines, procedures, and restrictions on the levy of school fees for school facilities, especially with regard to commercial/industrial development and residential development. AB 2926 was enacted by the state in 1986. Among other things, AB 2926 added various sections to the Government Code that authorize school districts to levy school fees on new residential and commercial/industrial development in order to pay for school facilities. The provisions of AB 2926 have since been expanded and revised by AB 1600 and AB 181.

AB 1600, which created Sections 66000 et seq. of the Government Code, was enacted by the state in 1987. AB 1600 requires that all public agencies satisfy certain requirements when establishing, increasing, or imposing a fee as a condition of approval for a development. In other words, AB 1600 limits the ability of a school district to levy school fees unless 1) there is a need for the revenues to be generated by school fees and 2) there is a nexus or reasonable causal relationship between the need for school fee revenues and the type of development project on which the school fees are imposed. AB 181 establishes additional requirements that must be satisfied by school districts prior to their levying school fees on commercial/industrial development.

Existing Conditions

The Orange Unified School District serves approximately 28,000 students in grades kindergarten through 12th. It encompasses the cities of Orange and Villa Park; portions of the cities of Anaheim, Garden Grove, Irvine, Santa Ana, and Tustin; and a portion of the unincorporated Orange County. As shown in Table 5.12-1, the District had capacity for 30,194 students for school year 2017/2018, per Section 17071.10(a) of the Education Code. Of these 30,194 seats, 17,081 were at the elementary school level (i.e., grades kindergarten through 6), 4,862 were at the middle school level (i.e., grades 7 and 8), and 8,251 were at the high school level (i.e., grades 9 through 12) (Cooperative Strategies 2018). The student enrollment in school year 2017/2018 was 27,984. The District is served by 27 elementary schools, 6 middle schools, and 4 high schools within its service boundaries.

5. Environmental Analysis PUBLIC SERVICES

Additionally, the District also operates 3 preschools and 3 alternative education facilities (Parkside Education Center, Canyon Hills, and Richland Continuation High School).

Table 5.12-1 OUSD Existing School Facilities Capacity and Student Enrollment

School Level	2017/2018 Facilities Capacity	2017/18 Student Enrollment	Excess/(Shortage) Capacity
Elementary (Grades K—6)	17,081	14,631	2,450
Middle (Grades 7 & 8)	4,862	4,450	412
High (Grades 9—12)	8,251	8,903	(652)
Total	30,194	27,984	2,210

Source: Cooperative Strategies 2018.

The Project Site is within the attendance boundaries of Anaheim Hills Elementary School, El Rancho Middle School, and Canyon High School.

5.12.3.2 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.

5.12.3.3 PLANS, PROGRAMS, AND POLICIES

Regulatory Requirement

RR PS-2 Pursuant to Senate Bill 50 (Chapter 407 of Statutes of 1998) (SB 50), the Project Applicant is required to pay development fees as adopted by the Orange Unified School District Board of Education.

5.12.3.4 ENVIRONMENTAL IMPACTS

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

Impact 5.12-3: The Proposed Project would not generate new students who would impact the school enrollment capacities of area schools. [Threshold SS-1]

As shown in Table 5.12-1, there is an excess capacity of 2,450 elementary school seats and 412 middle school seats within the District, but a shortage of 652 high school seats. The Project Site is within the attendance boundaries of Anaheim Hills Elementary School, El Rancho Middle School, and Canyon High School. According to the California Department of Education, the enrollment at Anaheim Hills Elementary School

5. Environmental Analysis

PUBLIC SERVICES

has declined in the past five years from 526 K through 6th graders in 2013/14 to 494 students. The highest enrolment in the past 10 years was 589 students in the 2009/10 and 2011/12 school years (CDE 2019). For El Rancho Middle School, student enrollment remained relatively stable in the past five years, where the 2017/18 school year enrollment was 1,197 compared to the 2013/14 enrollment of 1,191 in grades 7 and 8. Canyon High School’s enrollment also decreased, from 2,360 9th through 12th grade students in 2013/14 to 2,250 students in 2017/18.

Table 5.12-2 shows the anticipated number of students generated by the Proposed Project. Since the Project Site is currently developed with commercial uses, no students are generated under existing conditions. Implementation of the Proposed Project would generate approximately 17 elementary students, 5 middle school students, and 8 high school students, a total of 30 additional students. Considering the past enrollment trend at the school facilities serving the Project Site, the existing school facilities are anticipated to adequately serve the additional students generated by the Proposed Project without having to build new or expanded school facilities.

Table 5.12-2 Student Generation Summary

School Level	Dwelling Units	Multi-Family Attached Units Student Generation Factors	Students
Elementary (Grades K–6)	58	0.2792	16.1936
Middle (Grades 7–8)	58	0.0741	4.2978
High (Grades 9–12)	58	0.1389	8.0562
Total		0.4922	28.5476

Additionally, 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 (GC 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 17620. Payment of impact fees as adopted by OUSD, in compliance with SB 50, would reduce the impacts to an acceptable level. Impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

5.12.3.5 CUMULATIVE IMPACTS

The 58 additional housing units allowed by the Proposed Project would increase the demand on schools within the OUSD boundaries. However, the schools within OUSD boundaries have been experiencing downward student enrollment trend for the past eight years from 30,373 district-wide student enrollment in 2010/2011 school year to 27,915 students in 2017/2018 school year. Therefore, it is anticipated that there are adequate capacities within District schools to accommodate additional students generated by developments within OUSD boundaries. Also, 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

5. Environmental Analysis PUBLIC SERVICES

facilities.” The fees authorized for collection by OUSD are therefore deemed full and adequate mitigation of impacts on schools by various development projects including the Proposed Project. Therefore, no significant cumulative impacts are expected to occur to school services.

Level of Significance Before Mitigation: Less than significant.

5.12.3.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements and standard conditions of approval, the following impacts would be less than significant: 5.12-3.

5.12.3.7 MITIGATION MEASURES

No mitigation measures are required.

5.12.3.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts to school services would be less than significant without any mitigation. No significant unavoidable adverse impacts relating to school services would occur.

5.12.4 References

California Department of Education (CDE). 2019 (accessed). Data Reporting Office, K-12 Public School Enrollment, 3066621-Orange Unified, Time Series – Public School Enrollment.

<https://dq.cde.ca.gov/dataquest/DQ/EnrTimeRpt.aspx?Level=District&cYear=2005-06&cname=ORANGE%20UNIFIED&cCode=3066621>

California Department of Education (CDE). 2019 (accessed). Data Reporting Office, K-12 Public School Enrollment, 6097364-Anaheim Hills Elemen, Time Series – Public School Enrollment.

<https://dq.cde.ca.gov/dataquest/DQ/EnrTimeRptSch.aspx?cYear=2000-01&Level=School&cName=ANAHEIM+HILLS+ELEMEN&cCode=6097364&dCode=3066621>

California Department of Education (CDE). 2019 (accessed). Data Reporting Office, K-12 Public School Enrollment, 3066621-Orange Unified, Time Series – Public School Enrollment, 3066621-Orange Unified.

<https://dq.cde.ca.gov/dataquest/DQ/EnrTimeRpt.aspx?Level=District&cYear=2005-06&cname=ORANGE%20UNIFIED&cCode=3066621>

5. Environmental Analysis

PUBLIC SERVICES

This page intentionally left blank.