

4.13 PUBLIC SERVICES

4.13.1 EXISTING CONDITIONS

Anaheim Fire and Rescue

Anaheim Fire and Rescue is a full-service organization designed to provide essential public safety and emergency services to the community and its visitors. Anaheim Fire and Resource have 11 fire stations that provide fire protection and life safety services to the City. Anaheim Fire and Rescue’s fire and paramedic personnel and their civilian staff play a variety of important roles including fire and medical response, emergency management and disaster preparedness, training, community risk reduction homeland security, urban search and rescue and hazardous material response (Anaheim 2017a, Anaheim Fire and Rescue 2024a).

The City has sited fire stations strategically throughout the City to ensure an efficient demand response to all risk hazards and to help maintain recommended response times (Anaheim 2004). The nearest fire stations to the Project Site are listed in Table 4.13-1. Nearby Orange County Fire Authority (OCFA) stations are also listed in Table 4.13-1 given that OCTA also occasionally responds to fire events in the City of Anaheim in accordance with existing mutual aid agreements.

Anaheim Fire and Rescue has adopted and follows the expectations of the National Incident Management System (NIMS), which is a program used in the United States to coordinate emergency preparedness and incident management among various federal, State, and local agencies (Anaheim 2017a, Anaheim Fire and Rescue 2024a).

**TABLE 4.13-1
FIRE STATIONS NEAR THE PROJECT SITE**

Station	Address	Approx. Distance From The Project Site
Anaheim Fire and Rescue Station #10	8270 East Monte Vista Road Anaheim, CA 92808	0.75 mile to the southeast of the Project Site
Anaheim Fire and Rescue Station #9	6300 Nohl Ranch Road Anaheim, CA 92807	1.65 miles to the southwest of the Project Site
Anaheim Fire and Rescue Station #8	4555 East Riverdale Avenue Anaheim, CA 92807	3.51 miles to the west of the Project Site
Orange County Fire Authority Station #53	25415 La Palma Avenue Yorba Linda, CA 92887	2.59 miles northeast of the Project Site
Orange County Fire Authority Station #32	20990 Yorba Linda Boulevard Yorba Linda, CA 92887	1.45 miles north of the Project Site

Source: Google Maps 2023a, Anaheim Fire and Rescue 2024a.

Anaheim Police Department

Law enforcement and crime prevention services for the Project Site and the rest of the City are provided by the Anaheim Police Department (APD). APD is the largest city police department in Orange County with over 600 employees, including 420 sworn personnel. APD’s mission is to maintain a safe community. APD’s main station is located on Harbor Boulevard between Broadway and Santa Ana Street. APD’s East Station is located approximately 0.48-mile northeast of the Project Site at 8201 Santa Ana Canyon Road.

Orange Unified School District

The Project Site is located within the Orange Unified School District (OUSD). According to the OUSD website School Locator, the Project Site is located within the attendance boundaries for Crescent Elementary (for Transitional Kindergarten through 6th grade); El Rancho Charter School (for Kindergarten through 6th grade) and Running Springs Academy (for grades 7-8), and Canyon High School (for grades 9-12) (OUSD 2023a). Enrollment for schools near the Project Site during the 2023-2024 school year is provided in Table 4.13-2.

**TABLE 4.13-2
ENROLLMENT FOR SCHOOLS NEAR THE PROJECT SITE**

School	Grades Offered at This School	Number of Students Enrolled During the 2022-2023 School Year (approx.)
Crescent Elementary	K-6	784 students
Running Springs Academy	K-6	589 students
El Rancho Charter School	7-8	1,110 students
Canyon High School	9-12	2,133 students

Source: State of California Department of Education 2023a, OUSD 2024a.

Parks and Recreational Facilities

The City of Anaheim Parks Division owns and operates nearly 50 developed parks and recreational facilities totaling almost 700 acres. The City’s existing park and recreational facilities include neighborhood, community, and special use parks. Also, the City has over 50 miles of developed and proposed riding and hiking trails.

As described in more detail in Section 4.14 of this Draft EIR, existing parks and recreational facilities in the vicinity of the Project Site include Deer Canyon Park Preserve, the East Anaheim Community Center and Gymnasium, Sycamore Park, Ronald Reagan Park, Eucalyptus Park, Brush Canyon Park, Oak Park, Canyon Rim Park, Fred Barrera Park, Yorba Regional Park, and Featherly Regional Park.

Public Libraries

The Anaheim Public Library system includes a central library and six branch libraries along with the Anaheim Heritage Center, Founders' Park, Books on the Go! (self-service kiosk at Anaheim Regional Transportation Intermodal Center), and mobile library services including a mobile library and STEAM Van. The closest library branch to the Project Site is the East Anaheim Branch located at 8201 East Santa Ana Canyon Road, which is approximately 2 miles east of the Project Site (Anaheim 2023c).

4.13.2 REGULATORY SETTING

Regulations Applicable to Several Public Service Providers

Mitigation Fee Act

The Mitigation Fee Act requires any local agency establishing, increasing, or imposing an impact fee as a condition of development to identify the purpose of the fee and the use to which the fee is to purpose for which it is charged, and between the fee and the type of development project on which it is to be levied.

Fire Protection

California Building Code

The State of California provides a minimum standard for building design through the California Building Standards Code (CBC), which is in Part 2 of Title 24 of the California Code of Regulations. The CBC is based on the 1997 Uniform Building Code but has been modified for California conditions; it is considered to reflect some of the most stringent standards in the nation. It is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. Commercial and residential buildings are plan-checked by local, City, and County building officials for compliance with the CBC. Typical fire safety requirements of the CBC include: the installation of sprinklers in all high-rise buildings; the establishment of fire-resistant standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

California Fire Code

The 2022 California Fire Code and Office of the State Fire Marshal provides laws and regulations, standards and other guidance for local agencies in the development and enforcement of fire safety standards. The California Fire Code also establishes minimum requirements that are intended to provide a reasonable degree of safety from fire, panic, and explosion. The California Fire Code incorporates, by adoption, the International Fire Code of the International Code Council, with California amendments. This is the official Fire Code for the State and all political subdivisions. It is in Part 9 of Title 24 of the California Code of Regulations. The California Fire Code is revised and published every three years by the California Building Standards Commission.

California Health and Safety Code

California Health and Safety Code, Sections 13100–13135, establish the following policies related to fire protection:

- Section 13100.1: The functions of the office of the State Fire Marshall, including the California Department of Forestry and Fire Protection (CAL FIRE), shall be to foster, promote, and develop strategies to protect life and property against fire and panic.
- Section 13104.6: The Fire Marshall has the authority to require fire hazards to be removed in accordance with the law relating to removal or public nuisances on tax-deeded property.

City of Anaheim General Plan – Public Services and Facilities Element

The Public Services and Facilities Element of the City of Anaheim General Plan addresses fire protection and emergency services. Applicable goals and policies from the Public Services and Facilities Element that are related to fire protection are provided in Table 4.10-1 in Section 4.10 of this Draft EIR along with a project consistency analysis.

Police Protection

City of Anaheim General Plan – Public Services and Facilities Element

The Public Services and Facilities Element of the City of Anaheim General Plan addresses law enforcement and crime prevention. Applicable goals and policies from the Public Services and Facilities Element that are related to police protection and that are applicable to the Project are provided in Table 4.10-1 in Section 4.10 of this Draft EIR along with a project consistency analysis.

Schools

California Education Code

California Education Code Section 17620 authorizes school districts to require construction projects within the boundaries of the districts to pay a fee used for funding construction or reconstruction of school facilities.

City of Anaheim General Plan – Public Services and Facilities Element

The Public Services and Facilities Element of the City of Anaheim General Plan addresses school facilities. Applicable goals and policies from the Public Services and Facilities Element that are related to schools and that are applicable to the Project are provided in Table 4.10-1 in Section 4.10 of this Draft EIR along with a project consistency analysis.

Senate Bill 50

Senate Bill 50 (SB 50 or “Leroy Greene School Facilities Act” was enacted in 1998. It limits the power of cities and counties to require mitigation of school facilities impacts as a condition of approving new development and provides instead for a standardized developer fee. It represents the most significant school facility finance and developer fee reform legislation for school facilities construction and modernization since the adoption of the 1986 School Facilities Act. The payment of school mitigation impact fees authorized by SB 50 is deemed to provide full and complete mitigation of project impacts on school facilities. SB 50 provides that a State or local agency may not deny or refuse to approve the planning, use, or development of real property on the basis of a developer’s refusal to provide mitigation in amounts in excess of that established by SB 50.

SB 50 authorized statewide bonds in the amount of \$9.2 billion, with \$2.9 billion for new kindergarten through twelfth grade (K–12) construction to add capacity to local school districts. In 2002, Assembly Bill 16 modified the School Facility Program and authorized two additional statewide bond measures. Proposition 47 provided \$11.4 billion for K–12 schools and was approved by the voters in November 2002 (\$8 billion for new construction). A second bond measure in the amount of \$10 billion for K–12 schools (\$7.7 billion for new construction) was approved by the voters in 2004. SB 50 generally provides for a 50/50 State and local school facilities funding match. SB 50 also provides for three levels of statutory impact fees. The application level depends on whether State funding is available, whether the school district is eligible for State funding and whether the school district meets certain additional criteria involving bonding capacity, year-round school, and percentage of movable classrooms in use.

SB 50 added the following language to Government Code Section 65996:

(b) As noted above, the provisions of this chapter are hereby deemed to provide full and complete school facilities mitigation and, notwithstanding Section 65858, or Division 13 (commencing with Section 21000) of the Public Resources Code, or any other provision of state or local law, a state or local agency may not deny or refuse to approve a legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property or any change in governmental organization or reorganization, as defined in Section 56021 or 56073, on the basis that school facilities are inadequate.

(c) For purposes of this section, "school facilities" means any school-related consideration relating to a school district's ability to accommodate enrollment.

(d) Nothing in this chapter shall be interpreted to limit or prohibit the ability of a local agency to utilize other methods to provide school facilities if these methods are not levied or imposed in connection with, or made a condition of, a legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property or a change in governmental organization or reorganization, as defined in Section 56021 or 56073. Nothing in this chapter shall be interpreted to limit or prohibit the assessment or reassessment of property in conjunction with ad valorem taxes, or the placement of a parcel on the secured roll in conjunction with qualified special taxes as that term is used in Section 50079.

California Government Code, Section 65995

California Government Code, Section 65995 establishes the statutory criteria for assessing construction fees, also known as “developer’s fees”. The legislation has recognized the need for the fees to be adjusted periodically to keep pace with inflation; therefore, the State Allocation Board increases the maximum fees according to the adjustment for inflation in the statewide cost index for Class B construction.

As discussed further above, SB 50 amended Section 65995 of the California Government Code, which contains limitations on Section 17620 of the Education Code, the statute that authorizes school districts to assess development fees within school district boundaries. Section 65995(b)(3) of the Government Code requires the maximum square footage assessment for development to be increased every 2 years, according to inflation adjustments. School districts may levy higher fees if they apply to the State and meet certain conditions.

Parks and Recreation

The Quimby Act

The California Legislature first established the Quimby Act in 1975 and amended the act in 1982. Per the Quimby Act, California allows a City or County to pass an ordinance that requires, as a condition of approval of a residential subdivision, the dedication of land; the payment of a fee in lieu of dedication; or a combination of both for park or recreational purposes (California Government Code Section 66477). This legislation establishes maximum parkland dedication standards for new subdivision development unless the amount of existing neighborhood and community parkland exceeds the limit. The Quimby Act has a standard of 3 acres of parkland per 1,000 residents.¹

City of Anaheim General Plan – Green Element

The City of Anaheim General Plan’s Green Element addresses the provision of open space, conservation, recreation, and landscaping resources. It includes existing parks and open space, and potential recreational opportunities such as schools, utility easements, water uses, and vacant land. Applicable goals and policies from the Green Element that are related to recreation and are applicable to the Project are provided in Section 4.10 of this Draft EIR.

Anaheim Municipal Code

Per Section 17.08.210 of the Anaheim Municipal Code, the City requires new development involving a subdivision of land in the City to offer to dedicate land and pay a fee for development thereof, or pay a fee in lieu thereof, as set forth in Sections 17.08.200 through 17.08.290, for the purpose of providing park and recreational facilities to serve the future residents of each tract. As noted above, the General Plan’s Green Element as well as Section 17.08.250 of the Anaheim Municipal Code provides for a park standard of two acres of

¹ Cities with a ratio of higher than 3 acres per 1,000 persons are permitted to set a standard of up to 5 acres per 1,000 persons for new development. The calculation of a city’s park space to population ratio is based on a comparison of the population count of the last federal census to the amount of city-owned parkland.

parkland for each 1,000 residents. The dedication may be in the form of improved land, the payment of fees in lieu of dedication, or a combination of both.

Libraries

City of Anaheim General Plan – Public Services and Facilities Element

The Public Services and Facilities Element of the City of Anaheim General Plan addresses library services. Applicable goals and policies from the Public Services and Facilities Element that are related to library services and that are applicable to the Project are provided in Table 4.10-1 in Section 4.10 of this Draft EIR along with a project consistency analysis.

Anaheim Municipal Code

Per the Section 17.08.385 of the AMC, the City currently requires that any developer of a property that cannot be adequately or properly served by existing public library services either implement a public library services plan or be responsible for payment of fees based on the actual or estimated cost of public library services, as a condition of approval of any final map or parcel map.

4.13.3 THRESHOLDS OF SIGNIFICANCE

In accordance with the City of Anaheim’s Environmental Checklist, the Project would result in significant impacts related to public services if it would:

- a) Result in substantial adverse physical impacts associated with the provision 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 any of the public services:
 - i. Fire protection
 - ii. Police protection
 - iii. Schools
 - iv. Parks
 - v. Other public facilities (i.e., libraries)

4.13.4 IMPACT ANALYSIS

- a) *Would the Project result in substantial adverse physical impacts associated with the provision 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 any of the public services:*

i. *Fire protection?*

Less Than Significant With Mitigation Incorporated. In existing undeveloped conditions, the Project Site already requires and receives fire protection services. The Project Site is located within a Very High Fire Hazard Severity Zone and it currently contains a mix of vegetation that could burn during a wildfire event. Also, in existing conditions there are no fire hydrants or potable water supply on the Project Site.

The Project would result in an anticipated population increase of approximately 1,664 new City residents as well as employees assumed to be generated by the proposed commercial uses, which would increase the demand for fire protection services, including administrative tasks associated with approval and construction of the Project (e.g., building plan check) and response to fire service calls once the Project is occupied.

The Project would provide fire hydrants, fire access roads, and fuel modified vegetation areas within the Project Site in accordance with all applicable requirements and standards, which would collectively improve emergency access to the Project Site and capacity to fight future wildfires risk when compared to existing conditions (Anaheim Fire and Rescue 2024a). See also Section 4.18, Wildfire, for additional information in this regard.

During preliminary design of the Project, the Property Owner/Developer's team met with staff from Anaheim Fire and Rescue to introduce the Project and to exchange information related to fire access requirements and other similar topics. Subsequently, during the City's review of the formal development application that the Property Owner/Developer has submitted for this Project, Anaheim Fire and Rescue have been involved in three official rounds of review of the Project's plans. Through this process, refinements to the Project have been made based on comments received from Anaheim Fire and Rescue as well as other City reviewers (Anaheim Fire and Rescue 2024a). With incorporation of these additional refinements, Anaheim Fire and Rescue had no further comments.

Development of the Project would remove highly combustible vegetation from the Project Site and would replace it with fuel-modified slopes with new structures that would be built in compliance with the latest fire code requirements. By doing so, the Project would result in decreased wildfire exposure for private properties that are directly west of the Project Site as well as for motorists and cyclists using Santa Ana Canyon Road. See also Section 4.18, Wildfire, for additional information related to this topic.

The Project would be required to comply with all applicable codes, ordinances, and regulations including the AMC, which adopts by reference the 2022 California Fire Code and all incorporated

amendments, and the 2021 International Fire Code regarding fire prevention and fire suppression measures, fire hydrants and sprinkler systems, emergency access, and other similar requirements. As a result, these design measures would further minimize demand for fire protection services. As a part of the standard design review process, the Project's final design plans would be subject to the final review and approval by the City's Building and Safety Division and Anaheim Fire and Rescue, which would ensure that adequate emergency access, fire hydrant availability, and sufficient capacity for fire flows would be provided in compliance with all applicable codes and standards.

A Fire Master Plan has been for the Project, which is provided as Exhibits 4.13-1 through 4.13-4.

As shown in the Fire Master Plan, the Project would include the construction of new, all-weather fire lanes throughout the Project Site. No parking would be allowed along any of the internal fire lanes. The Project would include red striping and/or "No Parking / Fire Lane" signage at these locations. The Property Owner/Developer would be required to contract with a patrol and towing company to remove any vehicles that violate the parking rules within the Project Site. As detailed in the Fire Master Plan, first time violators would receive a written warning. For any subsequent violations the vehicle would be towed and the vehicle owner would be responsible for all costs incurred in remedying such violation, including without limitation the towing costs, citations, and legal fees.

The Project's internal fire lanes have been designed and would be required to be constructed in accordance with all applicable Anaheim Fire and Rescue requirements, which would be confirmed by the City/Anaheim Fire and Rescue as part of the final design/building permit process. For example, and as discussed further below, this review would ensure the Project follows standards for fire safety such as fire flow requirements for buildings, fire hydrant location and distribution criteria, automated sprinkler systems, and fire-resistant building materials. Moreover, the Developer/Property Owner would be required to pay applicable development impact fees to ensure a proportionate fair share contribution toward any future fire protection facilities needed to serve the Anaheim Fire and Rescue service area.

For example, all fire lanes have been designed to have a maximum grade of 10%. Fire lanes would be 4-inch-thick asphalt roadways that have been designed and maintained to support the imposed load of 78,000 pounds, which is needed to support fire apparatus. The Project's turnarounds and turning radiuses on primary backbone streets and drives have been designed to be 17.5-foot inside radius and 38-foot outside radius minimums. Fire department turnaround areas have been incorporated as needed throughout the Project Site, including on the west and east sides of the commercial use area, which would be accessible from "A" Street. These requirements would be confirmed during final design and plan check for the Project.

Also, to ensure adequate emergency response, all properties within the Project Site would be clearly identifiable through City-approved numbers (e.g., addresses) placed on the front elevation of all new buildings in a position that is plainly visible from the fire lanes.

As noted above, the Project would involve the installation of new fire hydrants throughout the Project Site. All fire hydrants would be installed, tested, and accepted prior to construction per the applicable provisions of the California Fire Code, and all hydrants would be identifiable from the street with a blue reflective marker. Hydrants would be required to be installed throughout

the Project Site so that all proposed structures are fully reachable with a 150-foot hose, as required the International Fire Code and AMC.

The Project would be required to include automatic fire sprinkler systems for all proposed buildings. The sprinkler system would be monitored 24-hours a day as detailed in the Fire Master Plan.

Project design for the multiple-family residential building as well as for the two commercial buildings account for the access requirements for Aerial Truck Ladders and Performance Aerial Truck Ladders, which require an additional 15-feet to 40-feet of access area between the structure and the fire access road. The Porte Cochere feature on the west side of the multiple-family residential building would have a minimum vertical clearance of 14-foot from the access road below to allow for fire apparatus to access and traverse this area.

The multiple-family residential building, courtyard areas, and parking structure would all be accessible to Anaheim Fire and Rescue via Knox Box access systems that would be installed at all vehicular and pedestrian access points. Similarly, the two proposed commercial buildings would be accessible to Anaheim Fire and Rescue via Knox Box access systems at the primary access points at the front and rear entrances of the buildings.

A fuel modification plan has been developed for and would be required to be implemented by the Project, which is provided as Exhibits ## through ##. The fuel modification plan breaks down the areas surrounding proposed buildings into specific zones, each of which has its own rules for planting and maintenance. Fuel modification plans are meant to minimize the potential effects of wildfires. The fuel modification plan identifies areas within 20-feet of structures as Zone A, which is the "Setback Irrigated Zone". These areas are required to be a minimum of 20-feet wide and to consist of flat level ground with automatic irrigation systems to maintain healthy vegetation with high moisture content. Plants in these areas must be highly fire resistant and selected from an approved fire-resistant plant list for the setback zone. The fuel modification plan further divides portions of the Project Site into Zone B and Zone C. Zone B is known as the "Wet Zone". Zone B ranges from 50- to 100-feet-wide, and it typically encompasses on the first/nearest slope to Zone A and the foundation of the building. Zone B would consist of irrigated landscaping. Zone B would be cleared of any combustible plant species irrigated and planted to minimize erosion of these areas. Zone C is referred to as the "Thinning Zone" would extend approximately 100 feet from the edge of Zone B. In Zone C, there would be a 50% thinning of native shrubs. In Zone D there would be a 30% thinning of native shrubs.

Also, roadside protection zones would be maintained along Fire Lanes that would be required to meet the same requirements as have been established for Zone B, which include 100% removal of undesirable shrubs and other requirements.

A list of undesirable and invasive plant species is provided within the fuel modification plan, which includes some non-native and/or invasive plant species as well as some native species such as chamise, California sagebrush, common buckwheat, and black sage. The Developer/Property Owner would be required to assume responsibility for maintaining fuel modification zones within the subject parcels. If an HOA is established covering all or portions of the Project Site, an HOA may assume responsibilities for fuel modification.

As described in the fuel modification plan, the Project would be required to complete as-needed thinning (removal) of vegetation, with primary maintenance periods in the late spring and early fall each year.

Radiant heat walls made of block would be constructed at specific locations within the Project Site. Radiant heat walls provide a fire-resistant barrier between structures and vegetation where full fuel modification zones are not possible due to terrain or other factors. The radiant heat walls would be a minimum of 6-feet tall. Pilasters have been incorporated for these walls to improve their aesthetics. Alternatively, the radiant heat walls could instead be constructed with a block wall base and ¼" clear tempered glass view panels. These heat walls are proposed to be located at two locations adjacent to the proposed single-family residential uses where topography, wind, and vegetation warrant their construction. These radiant heat walls were recommended as part of the Project's wildfire modeling and they would provide additional time to defend and evacuate buildings if a fire event were to occur at either of these locations in the Project Site.

The Project's buildings are considered to be within a "Radiant Heat Construction Zone". Therefore, the buildings would be required to be built in compliance with the California Building Code Chapter 7A or the California Residential Code Section R337, both of which covers building materials, systems and assemblies used in the exterior design and construction of new buildings located within a Wildland-Urban Interface (WUI).

According to the California Building Code as amended in the City's Municipal Code, "high-rise buildings" are buildings where the highest occupied floor is more than 75 feet above the lowest floor level that provides access to the interior of the building. High-rise buildings are subject to basic fire department requirements as well as additional provisions due to their unique firefighting challenges. For example, during fire events high rise buildings are different from traditional low-rise buildings in that they involve longer egress times and distances, different evacuation strategies, different fire department accessibility requirements, differing smoke movement, and fire control approaches. Also, the multiple floors of a high-rise building create the cumulative effect of requiring a large number of people to travel a substantial vertical distance on stairs to evacuate the building. The proposed multiple-family residential building would be classified as a high rise building pursuant to the foregoing. With implementation of the building requirements for a high rise building for the proposed multiple-family residential building, potential impacts related to internal evacuation and emergency access due to the height of the building would be minimized.

As discussed above, according to Anaheim Fire and Rescue, the relatively minor increase in demand for fire protection services that would result from the Project would not independently require the construction of new or alteration of existing fire stations or other fire protection facilities to maintain an adequate level of fire protection service to the Project Site and vicinity. However, to maintain current levels of response times Anaheim Fire and Rescue may need to add to their existing staffing to accommodate the Project as well as other cumulative projects in the vicinity of the Project Site (Anaheim Fire and Rescue 2024a). Payment of applicable development impact fees by the Property Owner/Developer would be available to Anaheim Fire and Rescue to support its staffing plans consistent with its broader planning efforts.

To improve the City's ability to more effectively manage traffic along Santa Ana Canyon Road during a potential future emergency evacuation, the Project would be required to implement

MM HAZ-5, which requires that prior to issuance of a certificate of occupancy, the Property Owner/Developer shall fund and implement closed-circuit television (CCTV) cameras at Imperial Highway/Santa Ana Canyon Road, Anaheim Hills Road/Santa Ana Canyon Road, Fairmont Boulevard/Santa Ana Canyon Road, Deer Canyon Road/Santa Ana Canyon Road, Festival Drive/Santa Ana Canyon Road, and Weir Canyon Road/Santa Ana Canyon Road.

To enhance emergency response times along Santa Ana Canyon Road, the Project would implement **MM HAZ-8**, which requires that prior to issuance of a certificate of occupancy, the Property Owner/Developer shall fund and implement emergency vehicle preemption at traffic signals on Santa Ana Canyon Road from Weir Canyon Road to Imperial Highway. Emergency vehicle preemption interrupts normal traffic signal timing to provide a green light to approaching emergency vehicles so that they can pass through intersections to get to emergencies more safely and more quickly. The goal with implementation of **MM HAZ-8** being that if emergency service providers can reach the scene of a wildfire more quickly, there would be greater potential to slow the spread of the wildfire and greater capacity for emergency service personnel to protect those individuals with the greatest need.

Also, as required by **MM HAZ-9**, prior to issuance of a certificate of occupancy, the Property Owner/Developer shall participate through the payment of a fair share contribution to Anaheim Fire and Rescue to support education and outreach including community exercises in support of “Know Your Way” evacuation planning and protocols. The community education and outreach for the larger eastern portion of the City would help to improve the Community’s understanding of “Know Your Way”, which will better facilitate more efficient and safer future evacuation events.

In conclusion, with implementation of the numerous Project design features described above, adherence to all applicable laws and regulations, and implementation of **MM HAZ-5**, **MM HAZ-8**, and **MM HAZ-9**, the Project would result in a less than significant impact related to the provision of fire protection services.

ii. Police protection?

Less Than Significant With Mitigation Incorporated. Development of the Project would result in an increase in population, employment and building space, which would result in an increased demand for police protection services from APD. Specifically, the Project would result in approximately 1,664 new City residents and employees, which would increase the demand for police protection services. Based on consultation with the APD, the Project would not generate demand for additional staffing (Anaheim Police Department 2024a).. However, in the future if additional police staff are needed, funding for any new personnel needed to maintain acceptable service levels would come from the City’s General Fund as well as payment of applicable development impact fees. Property taxes and other fees assessed for the Project Site would contribute to the General Fund revenues. Existing APD facilities would be sufficient to serve the additional demand associated with the Project along with the existing demand of the area.

The Project plans would be reviewed and approved by the City of Anaheim as part of the final design/building permit process to ensure adequate safety and crime prevention measures are provided.

As noted above, the Project would be required to implement CCTV and EVP technologies along Santa Ana Canyon Road to improve emergency personnel access and to better facilitate emergency evacuation if needed in the future.

With implementation of **MM HAZ-5** and **MM HAZ-8**, the Project would result in a less than significant impact related to the provision of police protection services.

iii. Schools?

Less Than Significant Impact. According to the OUSD student generation factors² (noted below), the Project would result in the addition of approximately 181 students to local schools, consisting of approximately 94 elementary school students, 28 middle school students, and 28 high school students, as shown below in Table 4.13-2, Estimated Project Student Generation (OUSD 2023b).

**TABLE 4.13-3
ESTIMATED PROJECT STUDENT GENERATION**

Grade Level	Student Generation Rate Per Unit	Maximum Number of Residential Units	Estimated Student Generation for the Project
Elementary School (K-6)	0.1862	504	94
Middle School (7-8)	0.0557	504	28
High School (9-12)	0.1165	504	58
Total Students			181
Source: OUSD 2023b, Table 4. OUSD 2024a. Student generation factors used in this table are for "multi-family attached units".			

² For purposes of a conservative analysis, the multi-family attached unit factor was used to determine Project student generation rates for both the proposed single-family and multiple-family uses.

**TABLE 4.13-4
PROJECT EFFECTS ON STUDENT ENROLLMENT**

School	Grades Offered At This School	Number of Existing Students Enrolled During the 2022-2023 School Year (approx.)	Estimated Students Generated By The Project At Each School Level	Project Students As Percentage Of Each School's 2022-2023 Enrollment (approx.)
Crescent Elementary	K-6	784 students	47 students*	5.99%
Running Springs Academy	TK-8 (International Baccalaureate Academy)	589 students	47 students*	7.98%
El Rancho Charter School	7-8	1,110 students	28 students	2.53%
Canyon High School	9-12	2,178 students	58 students	2.72%
Source: State of California Department of Education 2023a, OUSD 2024a.				
*Given location of the Project Site, this assumes that half (47 students) of the Project's approximately 94 elementary school aged students go to Crescent Elementary and half (47 students) go to Running Springs Academy.				

As shown in Table 4.13-4, the Project would increase the school enrollment of the nearby schools between 2.53 percent and 7.98 percent above their 2022-2023 enrollments. The Project would contribute a larger percentage of students to elementary schools than it would to the nearby middle school (El Rancho Charter School) and high school (Canyon High School). The Project would result in approximately an additional 14 students in each grade level at each local school.³

Orange Unified School District completed a District-wide Facilities Master Plan that was approved by the OUSD Board of Education on July 22, 2021. The District-wide Facilities Master Plan identifies long-term demographic trends, assesses current facilities conditions, and envisions educational program opportunities to develop strategies that address these needs and their impact on facilities in a comprehensive and thoughtful manner. Chapter 2.4 of the District-wide Facilities Master Plan contains enrollment projections that were developed for OUSD overall, which predict a gradual decline in enrollment from 26,742 students in 2020-2021 down to 24,006 students in 2026-2027.

For Crescent Elementary, the District-wide Facilities Master Plan identified that there were 517 actual students in 2019 and that there will be approximately 513 students at this school in 2026 based on OUSD's demographic projections (OUSD 2021a). However, as shown in Table 4.13-4 above, the number of existing students enrolled during the 2022-2023 school year was approximately 784 students at Crescent Elementary. Some of the primary improvements needed at the school per the school's site assessment were: shading for the kindergarten playground; parking layout and circulation issues; lockers and locker building improvements; modifications

³ Calculated by dividing the number of students generated for each school by the number of grades at that school.

to existing labs for use as classrooms; restroom upgrades; building painting; and flooring that needed to be replaced.

For Running Springs Academy, the District-wide Facilities Master Plan identified that there were 620 actual students in 2019 and that there will be approximately 638 students at this school in 2026 based on OUSD's demographic projections (OUSD 2021a). As shown in Table 4.13-4 above, the number of existing students enrolled during the 2022-2023 school year was approximately 589 students. Some of the primary improvements needed at the school per the school's site assessment were: landscaping and erosion improvements; fencing needs; stormwater/flooding issues; need for additional special needs spaces; and exterior modernization needs related to fascia and painting on existing buildings.

For El Rancho Charter School, the District-wide Facilities Master Plan identified that there being 986 actual students and that there will be approximately 953 students at this school in 2026 based on OUSD's demographic projections (OUSD 2021a). Some of the primary improvements needed at the school per the school's site assessment were: need for solar shading in recreational areas for students; ADA improvements needed; slip hazards; bathroom improvements needed.

For Canyon High School, the total number of existing students enrolled during the 2023-2024 school year was approximately 2,178 students. In 2019, OUSD conducted outreach and developed a plan for improvements at Canyon High School. Phase I campus improvements were built and completed in 2022 at Canyon High School, which included a new 61,000 square foot, two-story science center building, a new food service area, adding parking, creating a new drop-off area, and renovating the multi-purpose room. These improvements were funded by Measure S, which is providing \$288 million in funds to repair and upgrade OUSD's four high schools. The second phase of this school expansion project will focus on the modernization of the existing science building, including but not limited to interior remodeling and utility upgrades, as well as the removal of 21 portable buildings from the campus (OUSD 2022a).

The Project as well as other future developments in the OUSD service area would be required to pay applicable developer school fees that would be used for future facility improvements necessary to ensure adequate levels of service (OUSD 2023b). As explained in detail above, developer school fees are considered full and complete school facilities mitigation, and local governments are prohibited from assessing additional fees or exactions for school impacts, pursuant to SB 50. During outreach to OUSD Facilities and Planning staff in 2023 and 2024, OUSD staff did not identify any new school facilities or any school alterations that would be required to accommodate the new students that would result from the Project.

Therefore, the Project would result in a less than significant impact related to the provision of school services and no mitigation is required.

iv. Parks?

Less Than Significant Impact. The Project would result in new housing for up to approximately 1,664 new residents within the Project Site. These new residents would result in an overall increase in the usage of nearby parks and open space areas. In addition, the proposed commercial uses would be expected to generate a nominal amount of additional demand. The topic of increased recreational demand and usage of existing parks and their

potential physical deterioration from such additional usage is addressed in detail within Section 4.14 of this Draft EIR.

This threshold asks, instead, whether the Project would result in impacts associated with new or physically altered governmental facilities that would be needed to accommodate the Project to maintain acceptable service levels.

Based on coordination with the City of Anaheim Community Services Department, the Project would not directly result in the need for any new parks or in the physical alteration of any existing park or recreational facilities to maintain the City's goal of 2.0 acres per 1,000 residents (City of Anaheim 2024a). As described in Section 4.14, Recreation, the Project's 1,664 new residents would result in a demand for parkland of approximately 3.228 acres to maintain the City's goal of 2.0 acres per 1,000 residents.

The multiple-family residential component of the Project would provide a total of approximately 44,498 sf of indoor amenity space, approximately 67,857 sf of outdoor amenity space, and approximately 13,893 of private balcony space for a grand total of approximately 126,922 sf, or 2.913 acres, of recreational-leisure space.

The single-family residential component of the Project would involve custom, single-family estate lots offering private yards and canyon views.

In terms of recreational trail improvements, the Project would provide internal pedestrian connections throughout the Project Site as well as additional multi-use paths of travel throughout the portions of the Project Site proposed for residential and commercial development to connect to offsite uses, including Deer Canyon Park Preserve. The foregoing would be available to the public generally. Specifically, the Project would construct a new multi-use trail along the west side of Deer Canyon Road, which would connect to the City's existing trail network and the Deer Canyon Park Preserve, thereby extending the City's network of such trails.

The Project would also construct approximately 2,850 linear feet of a new multi-use (pedestrian, bicycle and equestrian) trail along the south side of Santa Ana Canyon Road that would extend from the northwestern limits of the Project Site (approximately 385 feet east of Eucalyptus Avenue) to an existing sidewalk that ends approximately 365 feet west of Festival Drive.

As required by **MM TRANS-4**, the Project would also construct approximately 2,950 linear feet of new sidewalk along the north side of Santa Ana Canyon Road from Eucalyptus Avenue to approximately 760 feet west of S. Festival Drive.

Also, the Project would rezone approximately 43.22 acres of the Project Site as Open Space, which is more than half of the total acreage (approximately 57 percent) of the Project Site. The purpose of this approach is to facilitate the retention of the existing open space, with the related aesthetic, scenic and habitat qualities, and to protect existing scenic view corridors.

In addition to the approximately 43 acres of contiguous open space referenced above that constitutes the Open Space component of the Project, as detailed in the Specific Plan, the proposed development also includes numerous additional green space areas (both common and private) to further enhance the scenic, water quality and aesthetic aspects of the Project.

Given that the Project would include substantial private recreational improvements and would install public multi-use trails, as described above, it is not anticipated that the Project would result in any actual, significant increase in use of City-owned public parklands such that new or physically altered park facilities would be triggered in order to maintain the applicable park ratio standard.

Moreover, to further ensure that the City is able to achieve its goal of 2.0 acres of parkland per 1,000 residents, the Project would be required to comply with the City's parkland ordinance, which would likely involve payment of the applicable park dedication fees in accordance with the AMC. Any future off-site park development for the broader community that is partially funded through the Project's development fees would incur a separate environmental review pursuant to the California Environmental Quality Act (CEQA). With implementation of the numerous Project design features listed above as well as adherence to developer obligations under the City's parkland ordinance, the City's target of 2.0 acres of public parkland per 1,000 acres from the AMC would be maintained by the Project.

Therefore, the Project would result in a less than significant impact related to the provision of adequate recreational spaces and no mitigation is required.

v. Other public facilities (i.e., libraries)?

Less Than Significant Impact. The City has not established a specific library service standard. The threshold of significance focuses on whether the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities triggered to ensure adherence to relevant performance standards, the construction of which could cause significant environmental impacts. As stated above, Project development would generate an increase in population of approximately 1,664 new City residents as well as new employees, which would result in a nominal additional demand for library services. However, the actual number of residents that would use the library on a given day would likely be minimal. Therefore, implementation of the Project would not adversely impact library services or trigger the need for construction of new or expanded library facilities. In addition, Section 17.08.385 of the AMC relating to Public Library Facilities Services Areas – Payment of Fees Required specifies that developer fees shall be deposited in a public library services fund. This fund shall be used for the construction, equipping, and supplying of said services. The Developer/Property Owner shall be required to pay the applicable library services development impact fee.

Therefore, the Project would have a less than significant impact related to other public facilities and no mitigation is required.

4.13.5 CUMULATIVE IMPACTS

The appropriate geographic scope for cumulative impacts is the service area for the respective service providers. Past, present and reasonably foreseeable future projects, including those described in more detail in Table 4-1, Cumulative Projects List, which is provided in Section 4.0, are considered.

Collectively, the cumulative projects and the Project would result in increased development that would collectively increase demand for public services provided by the Anaheim Fire & Rescue, APD, OUSD, City of Anaheim Parks Division, and the Anaheim Public Library. As discussed above, it is reasonable to assume that service providers would regularly review the needs of their users within their respective service areas and plan accordingly from a capital improvement as well as operation and maintenance perspective, and that such master planning efforts would help to ensure sufficient availability of public services for the growth in population associated with the Project, as well as other cumulative development. In addition, consistent with applicable policies and plans, it is reasonable to assume that service providers would identify whether and to what extent a specific proposal triggered the need for additional staffing or facilities. Cumulative projects would similarly be required to mitigate any identified impacts as well as pay applicable development impact and in lieu fees as well as property taxes; any new or expanded facilities that are built to provide public services would be required to obtain the necessary approvals and complete any required environmental review. Therefore, cumulative impacts related to the provision of new or physically altered governmental facilities would be less than significant. Furthermore, the foregoing would further ensure that the Project, which would be located in close proximity to ample public services with capacity to serve its residents and other users would not make a cumulatively considerable contribution to this already less than significant cumulative impact.

4.13.6 MITIGATION PROGRAM

See Section 4.8, Hazards and Hazardous Materials, of this Draft EIR for the mitigation measures referenced in this section.

4.13.7 SIGNIFICANCE AFTER MITIGATION

With implementation of mitigation measures **MM HAZ-4**, **MM HAZ-8**, and **MM HAZ-9**, potentially significant impacts related to public services would be reduced to less than significant levels.