

5.11 Public Services

5.11.1 INTRODUCTION

This section describes the existing fire protection, police protection, schools, and library facilities that serve the Project site and vicinity and evaluates the potential for implementation of the proposed Project to result in an impact. This section of the Supplemental 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, schools, and library services. Park services are addressed in Section 5.12, *Parks and Recreation*. Public utilities and service systems, including water, wastewater, drainage, and solid waste, are addressed in Section 5.15, *Utilities and Service Systems*. Information within this section is based on the following:

- *City of Santa Ana General Plan Update*
- *City of Santa Ana General Plan Update FEIR*
- *City of Santa Ana Municipal Code*
- *Data provided by each service provider*

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, or 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 proposed Project could constitute a significant impact.

5.11.2 FIRE PROTECTION SERVICES

5.11.2.1 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 General Plan Update

The City's General Plan Update (GPU) includes policies related to fire services in the Public Services Element that include the following:

- POLICY PS-1.10** Require that new development pays its fair share of providing improvements to existing or creating new public facilities and their associated costs and services.
- POLICY PS-2.1** Collaborate with the Police Department and the Fire Authority to promote greater public safety through implementing Crime Prevention through Environmental Design (CPETD) principles for all development projects.
- POLICY PS-2.2** Require all development to comply with the provisions of the most recently adopted fire and building codes and maintain an ongoing fire inspection program to reduce fire hazards.
- POLICY PS-2.7** Increase staffing levels for sworn peace officers, fire fighters, emergency medical responders, code enforcement, and civilian support staff to provide quality services and maintain an optimal response time citywide, as resources become available.
- POLICY PS-2.10** Maintain, update, and adopt an emergency operations plan and hazard mitigation plan to prepare for and respond to natural or human generated hazards.

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.

5.11.2.2 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 six city-owned fire stations located within approximately 4 miles of the Project site. Station 76, which is located 0.5 mile from the Project site, is the first responding station and Station 77, which is 2.2 miles from the site is the second responding station to the Project site. Both Stations 76 and 77 have Advance Life Support capabilities. In addition, at least two members of each station’s daily staff are paramedics. The location, equipment, and staffing of the Santa Ana fire stations within approximately 4 miles of the Project site are provided in Table 5.11-1.

Table 5.11-1: Santa Ana Fire Stations Near the Project Site

Fire Station	Location	Distance from Site	Equipment	Staffing
Station 76	950 West MacArthur Boulevard	0.5 mile	1 Paramedic Truck	1 Fire Captain, 1 Engineer, 2 Firefighters/Paramedics
Station 77	2317 South Greenville Street	2.2 miles	1 Paramedic Truck	1 Fire Captain, 1 Engineer, 2 Firefighters/Paramedics
Station 74	1427 South Broadway	2.9 miles	1 Paramedic Engine	3 Fire Captains/Paramedics 3 Fire Apparatus Engineers 3 Firefighters/Paramedics 3 Firefighters
Station 79	1320 East Warner	3.0 miles	1 Paramedic Engine	3 Fire Captains 3 Fire Apparatus Engineers 6 Firefighters/Paramedics
Station 73	419 South Franklin Street	3.4 miles	1 Paramedic Engine	3 Fire Captains/Paramedics 3 Fire Apparatus Engineers 3 Firefighters/Paramedics 3 Firefighters
Station 75	120 West Walnut	4.1 mile	1 Paramedic Engine 1 Paramedic Truck	6 Fire Captains/Paramedics 6 Fire Apparatus Engineers 6 Firefighters/Paramedics 6 Firefighters

Sources: GPU FEIR, Section 5.14, Public Services, and OCFA 2023

To manage fire services throughout the City, an OCFA division chief serves as the City’s local fire chief, and three battalion chiefs (one for each of the three 24-hour-shift schedules) provide daily management of station personnel and activities. Also, an administrative captain, administrative assistant, nurse educator, and a fire community relations and education specialist (bilingual) are assigned to serve the City of Santa Ana.

As provided by the OCFA 2022 Statistical Annual Report, there were 40,224 calls for service from the 10 fire stations in the City in 2022. Of the calls for service, 56.8 percent (22,835) were for emergency medical calls, 1.8 percent (734) were for fire incidents, and 17.5 percent (7,035) were for other incidents, which includes: cancelled service calls, ruptures, hazardous conditions, false alarms, and miscellaneous calls.

The OCFA 2022 standard for response is 8:30 minutes at the 90th percentile. Table 5.11-2 provides a summary of service and response metrics for the first and second responding stations to the Project site

(Station 76 and Station 77) in 2022. As shown, in 2022 the 90th percentile response time for Station 76 was 8:11 minutes and 8:53 for Station 77.

Table 5.11-2: Stations 76 and 77 Calls for Service and Response Data – 2022

Fire Station	Total Calls for Services	Emergency Medical Calls	Fire Calls	Other Calls	Total Incidents	90 th Percentile Response (min:second)
Station 76	2,604	1,728	39	837	2,604	8:11
Station 77	3,449	2,724	78	647	3,427	8:53

Source: OCFA 2023

5.11.2.3 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.

5.11.2.4 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 proposed 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.

5.11.2.5 FIRE PROTECTION SERVICE ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the GPU FEIR

The GPU FEIR determined that buildout of the GPU would consist of development of up to 36,261 housing units and 5,849,220 SF of non-residential development; resulting in a total of 360,077 residents and 170,416 jobs that would generate an increase in demand for fire services. This includes 8,733,780 SF of mixed uses, inclusive of residential uses, within the Project site. The GPU FEIR determined that future development under the GPU would comply with the California Fire and Building Codes, California Health and Safety Code, City ordinances, and applicable national standards to reduce needs related to fire services. The GPU FEIR determined that additional staff, equipment, and facilities would come from the City’s general fund to serve the growing population. Therefore, the GPU FEIR determined that impacts related to fire protection and emergency services and facilities would be less than significant.

Proposed Specific Plan Project

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 Impact. The proposed Project would remove the existing 16 commercial buildings and develop 3,750 multi-family residences, 200 senior/continuum of care units, 250 hotel rooms, and 350,000 SF of new commercial 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 5.10, *Population and Housing*, based on the multi-family unit factor of 2.41 persons per multi-family household within structures that have 50 or more residential units that was used to generate population estimates for the GPU buildout conditions, the proposed Project would result in 9,238 residents and 1,092 employees at full occupancy. The increased residential and employee population is expected to create the typical range of service calls to OCFA, largely related to medical emergencies. Medical emergencies accounted for 56.8 percent of service calls of OCFA service calls in Santa Ana during 2022, while fire calls consisted of 1.8 percent of service calls.

As described above in the Environmental Setting Section, there are six existing fire stations within approximately 4 miles of the Project site. The first responding station (Station 76) is 0.5 mile from the Project site, and the second responding station (Station 77) is located 2.2 miles from the Project site. The existing 90th percentile on-scene response time for emergency calls from Station 76 that is 0.51 mile from the Project site is 8:11 minutes, which is within the response time standard 90th percentile of 8:30 minutes. The existing 90th percentile response time for emergency calls from the second responding unit (Station 77) that is 2.2 miles from the Project site is 8:53 minutes, which slightly exceeds the response time standard (OCFA, 2023).

The calls for service from the additional population at the Project site could result in an increase in response times, and result in Station 76 exceeding the existing standards for service or result in Station 77 further exceeding the existing standards for service, 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 proposed 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 4 miles of six existing fire stations and the Project site is within a developed area that is currently served by a first responding station that is 0.5-mile from the Project site and a second responding station that is 2.2 miles from the Project site, the Project would not result in the requirement to construct a new fire station. 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 two stories in height, such as the buildings included in 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 two stories in height. The proposed Project would be required to pay a fire facilities fee to fund the improvement of existing fire facilities and provision of any needed equipment.

Additionally, the proposed Project would remove the existing buildings, which were constructed pursuant to fire code standards of the early 1970s and 1980s and develop new building structures pursuant to the most recent California building and fire codes, which would improve the fire safety of the Project site compared to the existing buildings. California's building/fire codes are published in their entirety every three years and were most recently updated in 2022. 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 proposed Project.

Overall, with the six existing fire stations within approximately 4 miles of the Project site, and the first and second responding stations 0.5 mile and 2.2 miles from the proposed Project, 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 proposed 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, equipment, and staffing could be augmented as needed, as disclosed within the GPU FEIR (with assistance from revenue provided by the proposed 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 as the stations have capacity for additional staffing. Therefore, impacts related to fire protection services would be less than significant and consistent with those identified in the GPU FEIR, which determined that impacts related to fire protection services would be less than significant.

5.11.2.6 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. Like the proposed Project, buildout of the City pursuant to the GPU would involve redevelopment of existing lands for more intensive uses; 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.

As shown in Table 5-1 and Figure 5-1, there are ten cumulative projects within Santa Ana in the Project vicinity that would combine to generate additional demands for OCFA services from the six City-owned fire stations located within approximately 4 miles of the Project site, including Stations 76 and 77 that are first

and second responding stations to the Project site. Four of the ten other projects include multi-family housing. The four other residential projects are anticipated to provide a total of 2,088 new residential units.

Because six of the City's ten existing fire stations are located approximately 4 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. Further, as disclosed in the GPU FEIR, fire vehicles, staff, equipment, and expansion of existing facilities would be funded by the 10-year cash contract with OCFA that is valid until 2030 and buildout pursuant to the GPU would result in less than significant impacts to fire protection services. Therefore, cumulative impacts associated with fire services would be less than cumulatively considerable.

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

The following standard regulations 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

5.11.2.8 FIRE PROTECTION SERVICE LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impact PS-1 would be less than significant.

5.11.2.9 FIRE PROTECTION SERVICE MITIGATION MEASURES

GPU FEIR Mitigation Measures

No mitigation measures related to fire services were included in the GPU FEIR.

Proposed Specific Plan Project Mitigation Measures

No mitigation measures are required.

5.11.2.10 FIRE PROTECTION SERVICE LEVEL OF SIGNIFICANCE AFTER MITIGATION

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

5.11.3 POLICE SERVICES

5.11.3.1 POLICE SERVICES REGULATORY SETTING

City of Santa Ana General Plan

The Public Safety Element includes the following public safety policies are related to police services and the proposed Project.

POLICY PS-1.10 Require that new development pays its fair share of providing improvements to existing or creating new public facilities and their associated costs and services.

POLICY PS-2.1 Collaborate with the Police Department and the Fire Authority to promote greater public safety through implementing Crime Prevention through Environmental Design (CPETD) principles for all development projects.

POLICY PS-2.7 Increase staffing levels for sworn peace officers, fire fighters, emergency medical responders, code enforcement, and civilian support staff to provide quality services and maintain an optimal response time citywide, as resources become available.

POLICY PS-2.10 Maintain, update, and adopt an emergency operations plan and hazard mitigation plan to prepare for and respond to natural or human generated hazards.

5.11.3.2 POLICE SERVICES ENVIRONMENTAL SETTING

The Santa Ana Police Department provides police services throughout the City. The Police Department headquarters is located west of City Hall (60 Civic Center Plaza), which is approximately 4.1 miles north of the Project site. The Police Department also has the following additional policing facilities (as shown on Figure 5.11-1, *Existing Police Facilities*):

- Westend Substation located at 3750 West McFadden Avenue, which is 4.4 miles from the Project site;
- Southeast Substation located at 1780 E McFadden Avenue, which is 4.8 miles from the Project site; and
- Santa Ana Police Athletic and Activity League (PAAL) Community Center located at 2627 West McFadden Avenue, which is 3.6 miles northwest of the Project site.

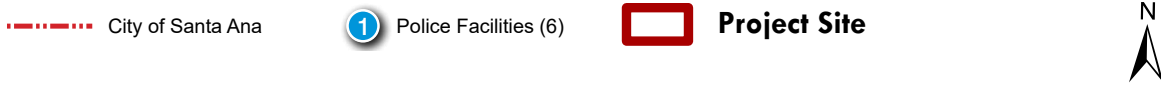
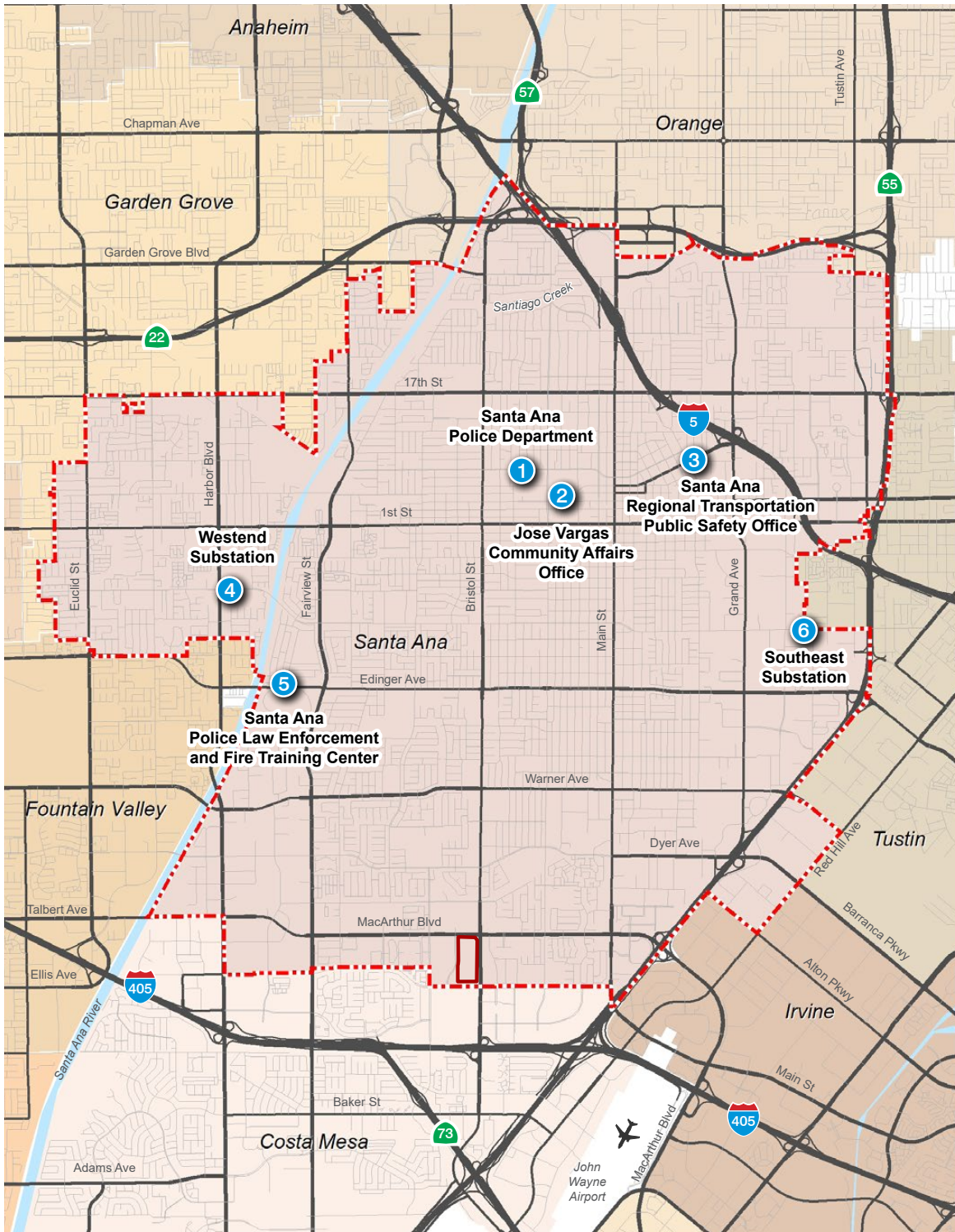
The Police Department is divided into four policing districts, they are listed below. The Project site is located within the Southcoast division.:

- Westend District, serving all areas north of First Street and west of Flower Street
- Southcoast District, serving all areas south of First Street and west of Flower Street
- Northeast District, serving all areas north of First Street and east of Flower Street
- Southeast District, serving all areas south of First Street and east of Flower Street

In 2022, the Santa Ana Police Department had 302 officers, which included 168 members in the Field Operations Bureau and 134 patrol officers (SAPD 2023). Based on the California Department of Finance estimate that 308,459 residents lived within the City in 2022, the City's sworn officer to population ratio is 0.98 officers per 1,000 population.

In 2022, officers responded to 126,973 calls for service and initiated 51,739 community engagement contacts and enforcement actions, which totaled 178,712 policing activities. In 2022, the average emergency response time was 5:22 minutes.

Existing Police Facilities



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Police Department Performance Standards

The Santa Ana Police Department has no set performance standards, nor does it apply a staffing ratio to evaluate performance needs. The Police Department uses the following two performance metrics to evaluate adequacy of services: call-for-service response times and implementation of de-escalation and virtual training platforms.

According to the Santa Ana Police Department 2022 Year-End Review, the Department was able to meet both performance metrics related to emergency response times and training. Training programs resulted in a 12 percent decrease in use of force and a 24 percent reduction in at-fault officer-involved traffic collisions in 2022. Additionally, the average emergency response time in 2022 was 5:22 minutes, a 20 percent reduction from 2020 (SAPD, 2023).

5.11.3.3 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.

5.11.3.4 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 proposed 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.

5.11.3.5 POLICE SERVICES ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the GPU FEIR

The GPU FEIR determined that buildout of the GPU would consist of development of up to 36,261 housing units and 5,849,220 SF of non-residential development; resulting in a total of 360,077 residents and 170,416 jobs that would generate an increase in demand for police services. This includes 8,733,780 SF of mixed uses, inclusive of residential uses, within the Project site. The GPU FEIR describes that the Santa Ana Police Department does not apply a staffing ratio but instead evaluates performance and needs. The GPU FEIR determined that that buildout of the GPU would result in the need for additional officers; the number of which would be based on the number of calls for service and average response times in the future. The GPU FEIR also determined that impacts to police services would be less than significant and did not identify the need for expanded or new policing facilities.

Proposed Specific Plan Project

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 POLICE SERVICES.

Less than Significant Impact. The proposed Project includes development of an administrative Police Department substation (no transfers or bookings) to be located within the commercial use area. The specific location would be determined prior to construction of Phase 1 of the proposed Project. The proposed Police Department substation would provide space for the expansion of policing services in the southern portion of the City, including the ability to quickly respond to emergency calls from within the Project site. The construction and operational activities related to the new police substation are included as part of the proposed Project and would not result in any physical environmental effects beyond those identified throughout this Draft EIR. For example, an analysis of construction emissions from building the new substation is included in Sections 5.1, *Air Quality*, and 5.5, *Greenhouse Gas Emissions*.

The proposed Project would result in an increase in onsite population that would create an increased demand for police services. As described in Section 5.10, *Population and Housing*, the proposed Project is anticipated to result in 9,238 residents and 1,092 employees at full occupancy. This residential and employee population is expected to create the typical range of police service calls.

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. During operation, the proposed Project would address typical residential security concerns by providing low-intensity security lighting, security cameras, electronic access to buildings, and onsite 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 (CPTED) measures (General Plan Policy PS-2.1) 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 9,238 residents. Based on the Police Department's 2022 staffing ratio of 0.98 officers per thousand population, at buildout, the proposed Project would require 9 additional officers. These new officers would be added to the Police Department staffing and would be accommodated by the proposed administrative Police Department substation because not all 9 would work at the same time, with staggered shifts in the field and on patrol. With the additional staffing and onsite proposed administrative Police Department substation, law enforcement personnel are anticipated to be able to respond in a timely manner to emergency calls within the Project site.

Providing adequate police personnel is part of the City's annual budgetary process, and it is the City's priority to provide adequate police officers and associated equipment. Because the addition of 9 additional officers, based on Project buildout assumptions, could be accommodated by the proposed administrative Police Department substation and also other existing City policing facilities, the proposed Project would not result in the requirement to construct any other new facilities or expand any of the City's existing policing facilities. Therefore, because the proposed Project incorporates a new substation as part of the proposed Project, the construction of which is analyzed in conjunction with the proposed Project, the proposed Project would not result in the need for additional new or physically altered police protection facilities offsite. As

described above, the proposed substation is analyzed as part of the proposed Project and would not result in any substantial impacts beyond those identified in the Draft EIR associated with the construction and operation of the proposed Project. Thus, substantial adverse physical impacts associated with the resulting necessity to provide new or expanded facilities, beyond those identified throughout this Draft EIR, would not occur as a result of the proposed Project and impacts would be less than significant. As such proposed Project impacts would be consistent with those identified as part of the GPU FEIR, which determined that impacts related to police protection services would be less than significant. Furthermore, the impacts of development of the proposed administrative Police Department substation are considered part of the impacts of the proposed Project as a whole and are analyzed throughout the various sections of this Supplemental EIR.

5.11.3.6 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 proposed Project would result in an incremental increase in demands on law enforcement services and based on the Police Department's 2022 staffing of 0.98 officers per thousand population, the proposed Project would require approximately 9 additional officers based on buildout of the proposed Project. These additional officers would be accommodated by the proposed administrative Police Department substation on the site.

Table 5-1 lists projects within the Police Department's Southcoast District (shown in Figure 5-1) that would be served by the same Police Department patrol staffing. Because the proposed Project includes an administrative Police Department substation facility and payment of development impact fees, as required for all development projects, it would provide facilities to accommodate police protection demands from Project residents and residents in the vicinity of the proposed Project, including residents of other cumulative projects.

The expansion of police services is 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. Because the proposed Project would provide an administrative Police Department substation on the site and 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 would not combine with other development projects to require expansion or construction of new police facilities, which could result in a significant environmental effect. Therefore, cumulative impacts associated with police services would be less than significant, which would be consistent with the findings of the GPU FEIR.

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

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

5.11.3.8 POLICE SERVICES LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impact PS-2 would be less than significant.

5.11.3.9 POLICE SERVICES MITIGATION MEASURES

GPU FEIR Mitigation Measures

No mitigation measures related to police services were included in the GPU FEIR.

Proposed Specific Plan Project Mitigation Measures

No mitigation measures are required.

5.11.3.10 POLICE SERVICES LEVEL OF SIGNIFICANCE AFTER MITIGATION

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

5.11.4 SCHOOL SERVICES

5.11.4.1 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.

City of Santa Ana General Plan

The Santa Ana GPU includes the following policies related to schools serving the proposed Project:

Land Use Element

POLICY LU-1.9 Evaluate individual new development proposals to determine if the proposals are consistent with the General Plan and to ensure that they do not compound existing public facility and service deficiencies.

Public Services Element

POLICY PS-1.10 Require that new development pays its fair share of providing improvements to existing or creating new public facilities and their associated costs and services.

5.11.4.2 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: twenty-six elementary schools, two K-6 schools, four K-8 schools, eight intermediate schools, seven high schools, four educational options secondary schools,

one dependent charter, one child development center, three early childhood education programs, and one K-6 deaf and hard of hearing regional program (SAUSD 2022).

According to the California Department of Education, SAUSD had an enrollment of 44,102 students in the 2021/2022 school year (CDE 2023). The Project site is in the attendance areas of Jefferson Elementary School (1522 W. Adams Street), which is approximately 1.4 miles from the Project site; McFadden Institute of Technology (2701 S. Raitt Street), which is approximately 1.5 miles from the Project site; and Segerstrom High School (2301 W. MacArthur Boulevard), which is approximately 1.0 mile from the Project site (SAUSD 2022). Table 5.11-3 shows the total capacity, the 2021-2022 school year enrollments, and the remaining capacity of the schools that would serve students residing on the Project site. As shown on Table 5.11-3, each of the schools have remaining capacity to serve between 368 and 911 additional students.

Table 5.11-3: Existing School Capacity of Schools Serving the Project Site

School	Total Capacity	2021-22 Enrollment	Remaining Capacity
Jefferson Elementary	975	607	368
McFadden Intermediate	2,065	1,154	911
Segerstrom High	3,024	2,523	501
Total	6,064	4,284	1,780

Sources: dq.cde.ca.gov and GPU FEIR Table 5.14-6

5.11.4.3 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 school services.

5.11.4.4 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.

As described in the GPU FEIR, school districts anticipate the number of students that would be generated by new residential development to plan for needed facilities. The generation rates used by the Santa Ana Unified School District are listed in Table 5.11-4.

Table 5.11-4: Santa Ana Unified School District Student Generation Rates

School Type	Single-Family Rate	Multi-Family Rate
Elementary School (K-5)	0.4028	0.1937
Intermediate School (6-8)	0.2203	0.1111
High School (9-12)	0.2868	0.1427

Source: GPU FEIR Table 5.14-7

5.11.4.5 SCHOOL SERVICE ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the GPU FEIR

The GPU FEIR determined that buildout of the GPU would consist of development of up to 36,261 housing units and 5,849,220 SF of non-residential development; resulting in a total of 360,077 residents and 170,416 jobs that would generate an increase in students and the demand for school services. The GPU FEIR Table 5.14-13 identifies that buildout of the General Plan Update would generate 5,896 elementary students, 3,372 intermediate school students, and 4,334 high school students in the Santa Ana Unified School District; and that the district would have a remaining capacity of 5,834 seats at elementary schools, 1,756 seats at intermediate schools, and 5,320 seats at high schools. Thus, the GPU FEIR determined that existing schools would be able to accommodate buildout of the GPU and funding for school improvements would be obtained from development fees pursuant to SB 50, and state and federal funding programs. The GPU FEIR also determined that pursuant to Section 65996 of the Government Code, payment of school fees is deemed to provide full and complete school facilities mitigation, and with payment of fees impacts would be less than significant.

Proposed Specific Plan Project

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 Impact. The proposed Project would develop 3,750 multi-family apartments, which would provide housing for families that may have school children. As shown in Table 5.11-5, based on the SAUSD student generation rates, the proposed Project would result in 726 elementary students, 417 intermediate students, and 535 high school students, which would total 1,678 students at Project buildout. The student population would account for approximately 18 percent of the total 9,238 residents at full occupancy.

Table 5.11-5: Students at Project Buildout

School Type	Multi-Family Rate	Total Students
Elementary School (K-5)	0.1937	726
Intermediate School (6-8)	0.1111	417
High School (9-12)	0.1427	535
Total Students		1,678

Source: GPU FEIR Table 5.14-7

As shown in Table 5.11-6, the existing remaining school capacity in the schools that would serve the proposed Project is a total of 1,780 spaces, which consists of 368 spaces at Jefferson Elementary School, 911 spaces at McFadden Intermediate School, and 501 spaces at Segerstrom High School.

Table 5.11-6: Remaining School Capacity with Buildout of the Proposed Project

School	Total Existing Capacity	2021-2022 Enrollment	Existing Remaining Capacity	Project Generated Students	Remaining Capacity with Project
Jefferson Elementary	975	607	368	726	-358
McFadden Intermediate	2,065	1,154	911	417	494
Segerstrom High	3,024	2,523	501	535	-34

Sources: SAUSD Master Plan, dq.cde.ca.gov, and GPU FEIR Table 5.14-6

As shown in Table 5.11-6, at buildout of the proposed Project, Jefferson Elementary School and Segerstrom High School may be over-capacity and additional or expanded facilities may be needed. However, the Santa Ana Unified School District Facilities Master Plan identifies that Jefferson Elementary School is planned for addition of a new two-story classroom building with 13,560 SF and 12 teaching stations; and Segerstrom High School is planned for a new 12,035 SF career technical education classroom building. These planned school facilities would assist in meeting future student capacity needs.

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 \$4.08 per square foot for all new residential development, and \$0.66 per square foot for new commercial development. Pursuant to Government Code Section 65995 applicants pay developer fees to the appropriate school districts at the time building permits are issued; and payment of the adopted fees provide 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, which is consistent with the findings of the GPU FEIR.

5.11.4.6 SCHOOL SERVICES CUMULATIVE IMPACTS

The geographic context for cumulative impacts to schools is the Santa Ana Unified School District boundaries. The proposed 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, at buildout, the proposed Project could generate approximately 1,678 additional students that would be accommodated by the existing schools with additional capacity available for cumulative projects.

The attendance boundaries of Jefferson Elementary, McFadden Intermediate, Segerstrom High School include areas 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 a minimum of two school facilities. Expansion of existing facilities are planned at both schools, and 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 may 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, which is consistent with the findings of the GPU FEIR.

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

- Government Code Section 65995(b)

5.11.4.8 SCHOOL SERVICES LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impact PS-3 would be less than significant.

5.11.4.9 SCHOOL SERVICES MITIGATION MEASURES

GPU FEIR Mitigation Measures

No mitigation measures related to school services were included in the GPU FEIR.

Proposed Specific Plan Project Mitigation Measures

No mitigation measures are required.

5.11.4.10 SCHOOL SERVICES LEVEL OF SIGNIFICANCE AFTER MITIGATION

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

5.11.5 LIBRARY SERVICES

5.11.5.1 LIBRARY SERVICES REGULATORY SETTING

City of Santa Ana Municipal Code

Section 35-114 (Residential Development Tax). This section of the Municipal Code imposes an excise tax on the privilege of engaging in residential development in the city. Any tax revenues collected pursuant to this section are placed in the City's general fund. General fund revenues are used to provide for the needs of public city libraries.

City of Santa Ana General Plan

The Santa Ana General Plan includes the following policies related to library services for the proposed Project:

Community Element

POLICY CM-2.6 Enhance educational opportunities in the community by expanding and maintaining access to libraries, learning centers, and technology through innovative funding sources.

Land Use Element

POLICY LU-1.9 Evaluate individual new development proposals to determine if the proposals are consistent with the General Plan and to ensure that they do not compound existing public facility and service deficiencies.

5.11.5.2 LIBRARY SERVICES ENVIRONMENTAL SETTING

The City of Santa Ana is served by two libraries: the Main Library (26 Civic Center Plaza) which is 4.3 miles north of the Project site, and Newhope Library Learning Center (122 North Newhope Street) which is 5.5 miles northwest of the Project site.

The Main Library is 39,790 SF and has amenities such as computer labs with internet access, a learning center, and the Santa Ana History Room. The History Room collects, preserves, and makes available materials of enduring historical value relating to the development of the City of Santa Ana and Orange County. The City of Santa Ana is planning the restoration and modernization of the existing Main Library.

The Newhope Library Learning Center is 10,600 SF, and includes computer labs with internet access, a learning center, and a TeenSpace. TeenSpace is a mentoring program aimed at keeping underserved Santa Ana youth off the streets, in school, and focused on college and career plans.

Library service needs are changing with the advent of increasing resources being available online and the availability of high-speed internet services.

5.11.5.3 LIBRARY 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 library facility, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for library services.

5.11.5.4 LIBRARY SERVICES METHODOLOGY

The potential impacts related to library services were evaluated based on the ability of existing and planned libraries to accommodate the population that would be generated by the proposed Project. Specifically, impacts on libraries are determined by identifying the extent to which the project would increase demand for services and analyzing the estimated increase in capacity of libraries 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.

The potential impacts related to libraries are considered in the context of the capacity and use of existing libraries. Due to the wide availability of information online, library usage has been declining in recent years and library service needs are changing with increasing resources being available online and the availability of high-speed internet services. As a result, library service standards (e.g., a certain number of volumes or SF of building space per thousand residents) are no longer appropriate when assessing the needs of a municipal library. A more appropriate standard is related to the physical usage of the library facility in relation to its physical capacity.

Commercial and employment-generating land uses do not typically generate a demand for library services. As such, the analysis of impacts on library services is based on the number of residents generated by the proposed Project and their anticipated usage of library facilities.

5.11.5.5 LIBRARY SERVICES ENVIRONMENTAL IMPACTS

Summary of Impacts Identified in the GPU FEIR

The GPU FEIR determined that buildout of the GPU would consist of development of up to 36,261 housing units and 5,849,220 SF of non-residential development; resulting in a total of 360,077 residents and 170,416 jobs that would generate an increase in demand for library services.

The GPU FEIR determined that Santa Ana has 0.1633 total library square footage per capita, which is considered inadequate to meet the needs of the existing population. The GPU FEIR determined that there is

a deficit of 99,409 SF in building area and a deficit of 243,483 in collection size; and that additional resources would also be needed, such as computers, staffing, and programs.

The GPU FEIR also determined that to meet the demands of the GPU buildout, an additional 15,190 SF of library facilities, 81,353 collection items, 16.25 full-time staff, and additional computers and programming would be needed. However, the GPU FEIR determined that funding for library services comes primarily from the property tax revenue, as well as library fines and fees collected from patrons, and state, federal, or government aid, and that as development occurs, property tax revenue should grow proportionally with the property tax collections. The GPU FEIR determined that with access to online resources, including eBooks and audiobooks that are available on the libraries' system, impacts would be less than significant.

Proposed Specific Plan Project

IMPACT PS-4 THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE PROVISION OF NEW OR PHYSICALLY ALTERED LIBRARY FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS.

Less than Significant Impact. The proposed Project would develop 3,750 multi-family residential units and a senior living/continuum of care use with up to 200 units, and a hotel with up to 250 rooms. Project buildout would result in approximately 9,238 additional residents, which would increase the demand for library services in the City. However, library use has declined due to the availability of online library materials and may continue to decline as the information available on the Internet increases exponentially over time (American Enterprise Institute [AEI], 2022). A majority of the residential units and many of the commercial areas (such as coffee shops, restaurants, etc.) would be equipped with internet access, which provide access to many of the same resources provided by the library and thereby limit the increased demand for library services and resources. As noted in the GPU FEIR, additional library square footage is needed to meet the demands of the GPU. Property tax revenue generated by the proposed Project, as well as future and existing development, would contribute municipal funding that could be used by the City to construct future library facilities. However, the decision to construct any such facilities and the nature of any construction would be within the discretion of the City, as the entity responsible for such construction and operation of the library. As the GPU FEIR explains, when specific projects are necessitated and subsequently undertaken by the City to address future growth demands, CEQA analysis would be conducted. Therefore, impacts related to expansion of library facilities would be less than significant. Additionally, pursuant to Section 35-114 of the Municipal Code, development fees would provide funding for library facilities.

Buildout of the proposed Project would not result in the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts. The GPU FEIR determined that with access to online resources, including eBooks and audiobooks that are available on the libraries' system, impacts would be less than significant. As the proposed Project would be developed consistent with the buildout assumption for the site pursuant to the GPU, impacts to library services would be consistent with those identified within the GPU FEIR. Therefore, impacts to library services would be less than significant.

5.11.5.6 LIBRARY SERVICES CUMULATIVE IMPACTS

The geographic scope for cumulative library services is the City of Santa Ana, which is the area served by the existing City libraries. As described previously, library service needs have changed with resources being available online and the availability of high-speed internet services in residences, residential amenity areas, and commercial locations. Therefore, new development, such as the proposed Project, results in a limited need for library resources/services or square footage of library space. Although demand for library services

may incrementally increase as cumulative development occurs through implementation of the GPU as discussed in the GPU FEIR, library use has declined due to the availability of online library materials and may continue to decline as the information available on the Internet increases exponentially over time (AEI, 2022). Thus, the combined effect of the proposed Project's impacts related to libraries would not result in the need for a new or expanded library, the construction of which could result in significant impacts. Therefore, impacts from cumulative impacts associated with library services would be less than significant.

5.11.5.7 LIBRARY SERVICES EXISTING STANDARD CONDITIONS AND PLANS, PROGRAMS OR POLICIES

- Government Code Section 65995(b)

5.11.5.8 LIBRARY SERVICES LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impact PS-4 would be less than significant.

5.11.5.9 LIBRARY SERVICES MITIGATION MEASURES

GPU FEIR Mitigation Measures

No mitigation measures related to library services were included in the GPU FEIR.

Proposed Specific Plan Project Mitigation Measures

No mitigation measures are required.

5.11.5.10 LIBRARY SERVICES LEVEL OF SIGNIFICANCE AFTER MITIGATION

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

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