4.13 PUBLIC SERVICES

This section of the EIR analyzes the potential environmental effects on public services, specifically fire protection and emergency response services, police protection services, school services, and library services within the proposed SGCP area as a result of the proposed project. Data for this section was obtained by coordinating with California Department of Education, Glendale Emergency Plan, Glendale Fire Department (GFD), Glendale General Plan Housing Element, Glendale Police Department (GPD), SCAG, and Verdugo Fire Communications Center. Full reference-list entries for all cited materials are provided in Section 4.13.5 (References).

4.13.1 Environmental Setting

Fire Protection and Emergency Response

The GFD (provides fire protection services within the proposed SGCP area. As the fourth largest city in Los Angeles County, Glendale is home to 201,668 residents (SCAG 2017). The GFD has an agreement through the Verdugo Fire Communications Center, which has the capability to coordinate with 44 different stations in the region to respond to incoming emergency calls. GFD also actively participates in the SEMS. Los Angeles County Office of Emergency Services has divided the County in disaster response areas. The City is part of the Area C Disaster Management Area, created in 2004 per Government Code Section 6500.

Locations and Staffing

Nine fire stations are located throughout the City, including three fire stations within the proposed SGCP area (Figure 4.13-1). Fire stations located in the proposed SGCP area and associated equipment are listed below in Table 4.13-1. The GFD currently has 153 sworn management and executive department personnel (GFD 2017). Fire Station 21 averages 285 calls per month, Fire Station 22 averages 238 calls per month, and Fire station 25 averages 303 calls per month. The average fire related response time from these stations is 5 minutes and 5 seconds (VFCC 2015). The GFD follows National Fire Protection Agency Standards (NFPA) for measuring performance. NFPA's standard for response time is 4 minutes (240 seconds) or less travel time for the arrival of the first arriving engine company at a fire suppression incident and 8 minutes (480 seconds) or less travel time for the deployment of an initial full alarm assignment at a fire suppression incident (VFCC 2015).

Table 4.13-1 Fire Stations Serving the Proposed SGCP Area

Station Number	*Location*	*Equipment*
Fire Station 21	421 Oak Street	Battalion 2, Engine 21, Truck 21, Basic Life Support Ambulance 21
Fire Station 22	1201 S. Glendale Avenue	Engine 22, Basic Life Support Ambulance 22
Fire Station 25	353 N. Chevy Chase Drive	Engine 25, Basic Life Support Ambulance 25

Source: GFD 2017

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FIGURE 4.13-1

Location of Fire and Police Stations

Source: City of Glendale 2017

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Standardized Emergency Management System

SEMS is an organizational and command structure required by California Government Code Section 8607(a) for the purpose of managing response to multi-agency and multi-jurisdiction emergencies in California. SEMS consists of five organizational levels, which are activated as necessary, and include: field response, local government, operational area, Office of Emergency Services Mutual Aid Regions, and California Office of Emergency Services. In addition, SEMS incorporates the use of the Incident Command System (ICS), the Master Mutual Aid Agreement and existing mutual aid systems, the Operational Area Concept, the Operational Area Satellite Information System (OASIS), and multi-agency or inter-agency coordination.

The City has adopted a SEMS/National Incident Management System Emergency Operations Plan for managing its response to multi-department and multi-jurisdiction emergencies and to facilitate communications and coordination between all levels of the system and among all responding departments and agencies. Glendale is located within Area C, in Los Angeles County, of the Southern Administrative Region of the California Office of Emergency Services (ECI 2003).

Mutual Aid Agreements

The foundation of California's emergency planning and response is a statewide mutual aid system which is designed to ensure that adequate resources, facilities, and other support is provided to jurisdictions whenever their own resources are inadequate to cope with a given situation. The California Emergency Services Act mandates the use of the California Disaster and Civil Defense Master Mutual Aid Agreement as the standard form of agreement between jurisdictions. The Master Mutual Aid Agreement creates a formal structure wherein the City retains control of its own facilities, personnel, and resources but may also receive or render assistance to/from other jurisdictions within the State. State government is obligated to provide available resources to assist the City on emergencies; however, it is the responsibility of the local jurisdiction to negotiate and prepare mutual aid agreements. Mutual aid agreements exist in law enforcement, fire services, medical and public works, building and safety, and emergency management. There are six mutual aid regions in California. The proposed SGCP area is located in Region I, the Office of Emergency Services Southern Administrative Region (Glendale 2008).

Unified Response

Effective February 14, 2005, a collaboration called Unified Response formed and merged dozens of automatic and mutual aid agreements between 11 fire departments into a single automatic aid agreement including: Alhambra, Arcadia, Burbank, Glendale, Monrovia, Monterey Park, Pasadena, San Gabriel, San Marino, Sierra Madre and South Pasadena. This eliminated potential delays which are common in mutual aid agreements, where permission to share resources is sought and obtained by communications center staff before the units can be dispatched. With an automatic aid agreement, this type of permission is not required; the communications center immediately dispatches the closest available units to maximize efficiently.

Unified Response expands the amount and availability of personnel and equipment that fire departments can use without delay. Under Unified Response, fire stations have access to 46 engines, 13 trucks, 5 water tenders, and many other specialized units, such as Hazmat and Urban Search and Rescue equipment. The current plan also shares rescue ambulances on an automatic basis. Among the 11 fire departments of Area C, borderless fire response areas were created, which allows the Verdugo Fire Communications to dispatch the closest appropriate emergency equipment, regardless of its affiliation or where the fire occurs.

A system of "key stations" was developed by identifying 20 strategically placed fire stations that, if staffed and equipped during a major disaster, would still provide sufficient coverage for the entire geographic area under most circumstances. During a major incident with maximum draw-down of area resources, most or all of the key stations would remain staffed to respond to any other incidents that occur in the area. If at that point additional resources are needed for the major incident, mutual aid would be sought at the region or state level (GFD 2017).

Fire Prevention Bureau

The Fire Prevention Bureau (FPB) is dedicated to increasing safety, preventing or reducing fire losses, and ensuring compliance with applicable codes and ordinance. Fire Prevention personnel staff the FPB, which is comprised of several units, including fire engineering, environmental management, inspection services, and vegetation management.

The goal of the FPB is to protect the community from fire and environmental hazards through programs providing for adherence to fire regulations, public education, and hazard mitigation. To meet this goal, the FPB issues fire permits; completed plan checks for fire, life safety, and environmental requirements; conducts fire, life safety, and environmental inspections; operates the Environmental Management Center; and oversees the Vegetation Management Program (GFD 2017).

Emergency Medical Services

The proposed SGCP area is located within the response district for Rescue Ambulances 21, 22, and 25, which currently average about 1,200 and 1,435 calls per month. In 2015, Basic Life Support (BLS) Ambulance 21 responded to 4,210 calls, BLS Ambulance 22 responded to 2,045 calls, and BLS Ambulance 25 responded to 4,017 calls. The average medical related response time from these stations is 4 minutes and 26 seconds (VFCC 2015). Combined, the three fire stations servicing the proposed SGCP area responded to 1,692 fire incidents and 10,272 medical incidents in 2015 (VFCC 2015).

Police Protection

The GPD (and the Los Angeles County Sheriff's Department (LASD) provide police protection services to the proposed SGCP area. Protection services include emergency and non-emergency police response, routine police patrols, investigative services, traffic enforcement and investigation, parking code enforcement, SWAT teams, K-9, specialized detective units, and air support.

Locations and Staffing

The GPD's service boundary includes all property within the City's jurisdictional boundary, including City owned parcels. The station is located within the proposed SGCP area at 131 N. Isabel Street. Police services are provided to areas outside the GPD service boundary when police staff observe criminal acts and threats to public safety, if requested by allied public safety agencies to provide assistance, and in the course of mutual aid requests by California cities and counties during emergency conditions ranging from natural disasters to civil disturbances.

The GPD has 244 sworn police officer positions and 105 professional staff (GPD 2017). The standard officer-to-population ratio in the City is two officers per 1,000 residents, which is currently below recommended staffing levels.

The GPD has specialized units including a Special Weapons and Tactics Team (SWAT), the AB 109 Task Force, and a K-9 Unit to serve residents. A SWAT team is a designated unit of law enforcement officers that is specifically trained and equipped to work as a coordinated team to resolve critical incidents which are hazardous, complex or unusual and may exceed the capabilities of first responders or investigative units including, but not limited to, hostage taking, barricaded suspects, snipers, terrorist acts, and other high-risk incidents. SWAT may also be used to serve high-risk warrants, both search and arrest, where public and officer safety issues warrant the use of such a unit. Members of SWAT are "on-call" to respond to any emergency requiring their services. This team is dedicated to the preservation of life and resolving situations peacefully.

The Glendale AB 109 Task Force, established in July 2013, addresses the needs of realignment. The Task Force is comprised of officers from Glendale, Burbank, and San Fernando who partner with the Los Angeles County Probation Department to address the supervision of individuals released from prison on Post Release Community Supervision. Using department resources and a variety of tactics, the AB 109 Task Force ensures individuals on active probation, parole, Post Release Community Supervision, and registered sex offenders obey all laws and are in compliance with court conditions. The Glendale AB 109 Task Force has established working relationships with the Department of Family and Children Services, California Department of Corrections, Department of Homeland Security, District Attorney's Office, Code Enforcement, and local law enforcement agencies to supervise the probation population.

Currently, the K-9 unit includes two patrol dogs that are trained in suspect apprehension and hard surface tracking, and one narcotics detection canine assigned to a narcotics detective.

Response Time

The average response time for emergency calls (Priority E) in March of 2017 was 4 minutes and 41 seconds. Priority 1, 2, and 3 calls are considered non-emergency. Response times for non-emergency calls range from 5 minutes and 21 seconds to 1 hour and 5 seconds. The GPD does not have an emergency response time goal (GPD 2017).

Schools

The proposed SGCP area is located within the boundaries of the GUSD. The GUSD boundaries extend past the proposed SGCP area to include all of Glendale and the unincorporated Los Angeles County communities of La Crescenta and Montrose. A small portion of La Cañada Flintridge (northeast of the proposed SGCP area) is also served by the GUSD (Figure 4.13-2).

GUSD includes 20 elementary schools, four middle schools, four high schools, a magnet high school which offers specialized courses, an independent study academy, and specialized programs. Within the proposed SGCP area, there are seven elementary schools with a total enrollment of 4,868 students, one middle school with an enrollment of 770 students, and two high schools with a total enrollment of 2,647 students, as shown in Table 4.13-2. During the 2015-2016 school year, GUSD had a total enrollment of 26,007 students and enrollment within the proposed SGCP area was 8,285 students (DOE 2017).

Table 4.13-2 GUSD Schools within the Proposed SGCP Area

School	*Location*	*Current Enrollment*
Cerritos Elementary School	120 E. Cerritos Avenue	425
Columbus Elementary School	425 W. Milford Street	599
Thomas Edison Elementary School	435 S. Pacific Avenue	884
Horace Mann Elementary	501 E. Acacia Avenue	661
John Marshall Elementary School	1201 E. Broadway	516
John Muir Elementary School	912 S. Chevy Chase Drive	886
R.D White Elementary School	744 E. Doran Street	897
	Elementary (K–5) Schools Total	**4,868**
Theodore Roosevelt Middle School	222 E. Acacia Avenue	770
	Middle (6–8) Schools Total	**770**
Daily (Allan F.) High School	220 N. Kenwood	218
Glendale High School	1440 E. Broadway	2,429
	High (9–12) Schools Total	**2,647**
	All Schools Total	**8,285**

Source: DOE 2017

Library Facilities

Library services in Glendale are provided by the Library, Arts and Culture Department. According to the latest figures Fiscal Year 2014-2015, the books per capita ratio is 2.87 per resident and the annual circulation is 6.97 per resident (Glendale 2016). Branches within the proposed SGCP area include the Downtown Central Library, Pacific Park Library, and the Library Connection at Adams Square Branch. Figure 4.13-3 shows the location of the public library facilities within the proposed SGCP area. The libraries in the proposed SGCP area range in size from approximately 2,200 to 92,000 square feet. Library collections consist of books, videos, and electronic resources.

Table 4.13-3 shows the collection size, floor area, and population served by each of the three City libraries. Downtown Central Library is a 92,000-square foot facility with a collection of 257,832 books servicing 195,799 residents. Library Connection at Adams Square provides library services to 34,656 residents in a 2,190-square foot facility with 15,065 volumes; and the Pacific Park Branch Library, an 8,300-square foot facility with 56,993 volumes servicing 30,740 residents.

Table 4.13-3 Public Library Facilities within the Proposed SGCP Area

Library and Location	*Collection Size (FY 2014-15)*	*Floor Area (sf)*	*Service Population*
Downtown Central Library, 222 E. Harvard Street	257,832	92,000	195,799
Pacific Park Library, 501 S. Pacific Avenue	56,993	8,300	30,740
Library Connection at Adams Square, 1100 E. Chevy Chase Drive	15,065	2,190	34,656
Total	**329,890**	**102,490**	**261,195**

sf = square feet
Source: Glendale 2017

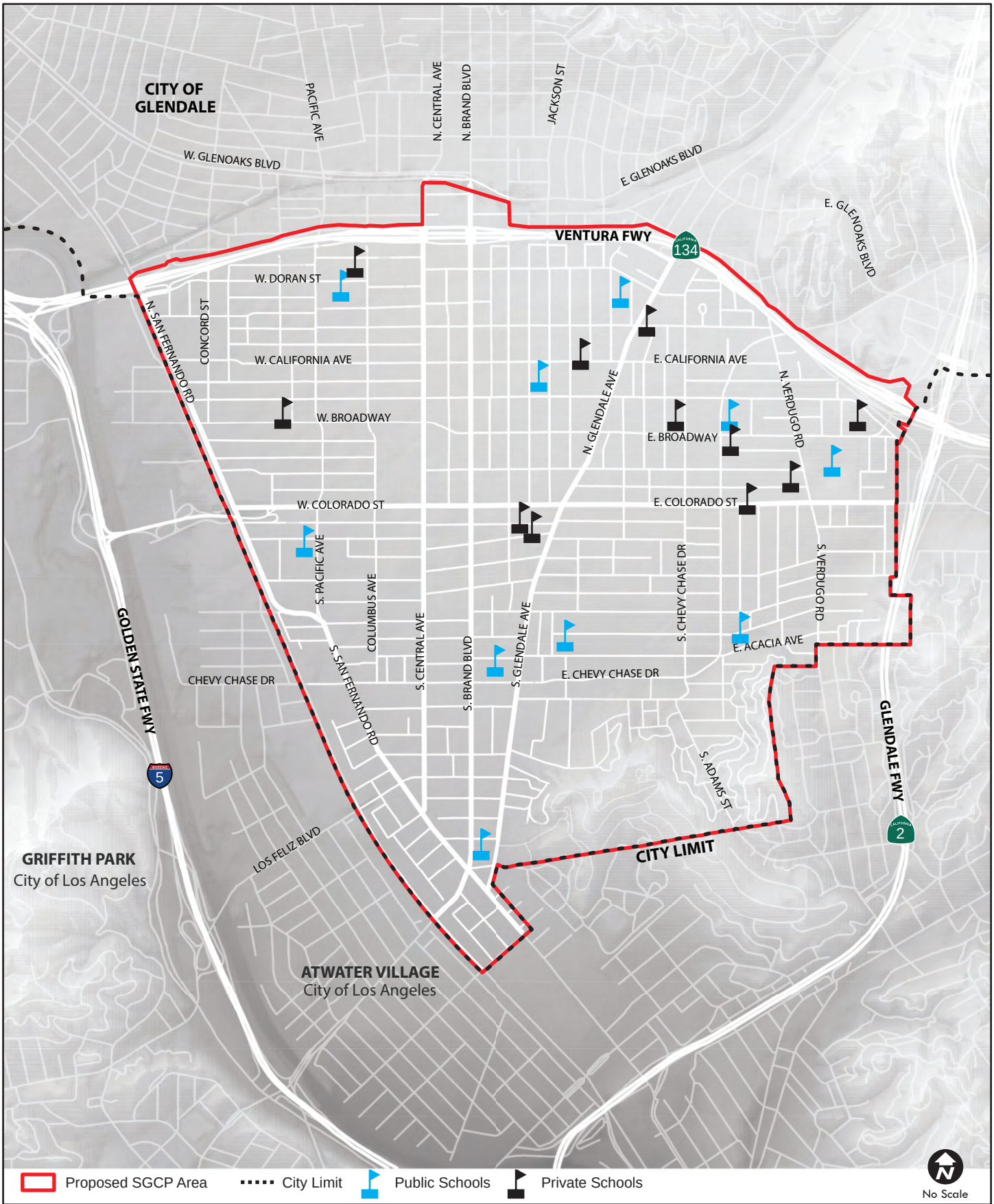

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FIGURE 4.13-2

Location of Public and Private Schools

Source: City of Glendale 2017

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FIGURE 4.13-3

Location of Libraries

Source: City of Glendale 2017

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4.13.2 Regulatory Framework

Federal

There are no existing federal regulations pertaining to public services that are applicable to the proposed project.

State

California Fire Code

The California Fire Code (CCR Title 24, Part 9) includes regulations which are consistent with nationally recognized standards of good practice, intended to facilitate protection of life and property. Among other things, its regulations address the mitigation of the hazards of fire explosion; management and control of storage, handling, and use of hazardous materials and devices; mitigation of conditions considered hazardous to life or property in the use or occupancy of buildings; and provisions to assist emergency response personnel. The City Council passed an ordinance to adopt the 1998 *California Fire Code* as the model code for fire protection.

California Health and Safety 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 the CBC), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

School Facilities Act of 1986

In 1986, School Facilities Act of 1986 (AB 2926) was enacted by the State of California authorizing entities to levy statutory fees on new residential and commercial/industrial development in order to pay for school facilities. AB 2926, titled the School Facilities Act of 1986, was expanded and revised in 1987 through the passage of AB 1600, which added Section 66000 et seq. of the Government Code. Under this statute, payment of statutory fees by developers would serve as total CEQA mitigation to satisfy the impact of development on school facilities.

Greene Schools Facilities Act

The passage of the Greene Schools Facilities Act (SB 50) in 1998 defined the Needs Analysis process in Government Code Sections 65995.5 to 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. The fees (referred to as Level One fees) are assessed based upon the proposed square footage of residential, commercial/industrial, and/or parking structure uses. Level Two fees require the developer to provide one-half of the costs of accommodating students in new schools, while the State would provide the other half. Level Three fees require the developer to pay the full cost of accommodating the students in new schools and would be 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. However, voter approval of Proposition 55 on March 2, 2004, precludes the imposition of the Level Three fees for the foreseeable future. Although the State Allocation Board has determined that State funds for new school construction are unavailable, the issue regarding implementation of Level 3 fees is

currently unresolved; therefore, at the time of this EIR districts may impose only Level Two fees, as calculated according to SB 50.

Regional

There are no existing regional regulations pertaining to public services that are applicable to the proposed project.

Local

Glendale General Plan

The following Glendale General Plan policies, goals and objectives located in the Community Facilities Element, Housing Element, and Safety Element are applicable to public services.

Community Facilities Element

- **Goal:** Enhance the current level and quality of community facilities and services, and improve accessibility to them.
  - **Protection Policy:** Maintain the availability of high level, competent fire protection.
  - **Protection Policy:** Monitor future community needs for protection facilities and services as new growth warrants or as facilities are displaced.
  - **Protection Policy:** Continue the effort to reduce crime and violence.
  - **Education Policy:** Monitor future school enrollments to determine whether boundary adjustments and/or school removals or additions will be required.
  - **Library Policy:** Preserve the high standards of library facilities in their educational and recreational role.

Housing Element

- **Goal 6:** A city with housing that is livable sand sustainable.
  - **Policy 6.1:** Guide and plan for resources to accommodate future housing need to prevent overcrowding and over-utilization of existing community resources.

Safety Element

- **Goal 4:** Reduce the loss of life, injury, private property damage, infrastructure damage, economic losses and social dislocation and other impacts resulting from fire hazards.
  - **Policy 4-1:** The City shall ensure to the extent possible that fire services, such as fire equipment, infrastructure damage, economic losses and social dislocation and other impacts resulting from fire hazards.
  - **Policy 8-1:** The City shall prepare for emergency response and recovery from natural and urban disasters.

Glendale Fire Department Strategic Plan 2011-2016

- **Goal:** Develop and implement standard operating guidelines for all hazards and risks within Glendale.

Local Control Accountability Plan

In 2013, California adopted the Local Control Funding Formula (LCFF), a formula for deciding how much money each school district receives. LCFF requires school districts to get input from their local communities. Budgets must also be tied to improvement goals by creating a Local Control and Accounting Plan (LCAP). GUSD LCAP committee continues to support the LCAP goals: (1) Common Core; (2) College and/or Career Readiness; (3) Social, Emotional and Physical Needs of all students; (4) Intervention Programs; (5) Learning Beyond the Core Curriculum; (6) Engaged Parents, Teachers, Staff, Students and Community Members; and (7) Safe and Secure Learning Environment.

Development Impact Fee

Development impact fees are imposed on new development as a condition of the issuance of a building permit or subdivision tract map for a development project. If a project is approved, the development impact fee for public use facilities, including libraries, parkland, and park facilities will be imposed on that project as a condition of approval. Municipal Ordinance No. 5575, Public Use Facilities Development Impact Fee Ordinance, of the GMC Chapter 4.10 was first adopted in September 2007; in 2014, the City adopted Ordinance No. 5820 and Resolution No. 14-10, increasing the development impact fees for parks and libraries to the full Consumer Price Index adjusted amount of $18,751 per multi-unit residential unit and $6.50 per commercial square foot.

4.13.3 Project Impacts and Mitigation

Analytic Method

Potential impacts resulting from implementation of the proposed project were evaluated and based on the ability of the GFD to maintain adequate service ratios and response times without resulting in the need for the provision of new or physically altered governmental facilities; adequacy of existing GPD staff to meet additional demand from police protection services, effects on the officer-to-population ratio; applying current district student generation ratios for dwelling units by grade level to additional proposed units and number of students generated as a result of implementation of the proposed project to determine if school facilities could accommodate an increase in students; and adequacy of existing library facilities to meet additional demand for library services.

Thresholds of Significance

The following threshold of significance is based on the 2017 State CEQA Guidelines Appendix G. For purposes of this EIR, implementation of the proposed project may have a significant adverse impact: if it would 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:

- Fire protection
- Police protection
- Schools
- Libraries

Less Than Significant Impacts

Threshold	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or in the 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 schools?

Impact 4.13-1 Implementation of the proposed project would increase the demand for school services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand. However, existing services would accommodate growth associated with the proposed project. This impact is *less than significant*.

There are currently 37,903 dwelling units within the proposed SGCP area. Full buildout of the plan would allow up to 10,337 additional dwelling units. According to the SCAG Profile of the City2017, the population generation rate is 2.7 persons per dwelling unit (SCAG 2017). The existing population within the proposed SGCP area is 102,338 residents, and that would potentially increase by 27,910 people under the proposed SGCP. Therefore, the project would contribute to the population growth and increasing demands for school services within the proposed SGCP area.

In the past, the GUSD has experienced overcrowding which has decreased due to lower school enrollment over the last several years, the addition of new classrooms at existing schools, and the re-opening of schools. According to the Glendale General Plan Housing Element prepared in 2014, despite the reduction in overcrowding, many schools are still near capacity and enrollment may begin to increase as population continues to rise (Glendale 2014).

As shown in Table 4.13-2, seven elementary schools, one middle school, and two high schools are located within the proposed SGCP area. Current enrollment at these schools total 8,285 students. Full buildout of the proposed SGCP would result in an increase of 10,337 dwelling units. Assuming a student ratio of 0.18 students per dwelling unit (Glendale 2016), implementation of the proposed SGCP would increase enrollment at GUSD schools by approximately 1,861 students. Current school locations within the proposed SCGP area are shown on Figure 4.13-2.

To maintain acceptable service ratios, the construction of new or expanded school facilities may be required. In accordance with SB 50, at the time of building permit issuance, development projects are required to pay established school impact fees. Funding collected under SB 50 would reduce impacts to GUSD facilities, which serve the proposed SGCP area to a less than significant level. Under AB 2926, the GUSD collects development impact fees on new construction at a current rate of $2.24 to $2.63 per square foot for residential development. New commercial and industrial construction includes a development impact fee currently of $0.31 per square foot of covered or enclosed space. School construction is also funded through local general obligation bonds and the State Bond Fund (Glendale 2014).

The GUSD would potentially need to expand existing schools and/or provide new facilities in order to accommodate growth associated with the proposed SGCP. While overcrowded schools constitute a social impact, they do not rise to the level of a significant environmental impact due to the required impact fees. The GUSD planning department would make the decision to provide new or physically

altered school facilities and any new facility would undergo its own environmental analysis to address site-specific environmental concerns.

Development under the proposed SGCP would comply with all local, State, and federal regulations pertaining to school services. In addition, all discretionary projects are subject to environmental review and standard mitigation measures are applied as part of the conditions of approval for the project.

Per current state law, including SB 50, developer impact fees are used to mitigate impacts on school facilities. Implementation of the proposed SGCP would increase the number of students attending GUSD schools within the proposed SGCP area; however, payment of development impact fees has been deemed to provide full and complete school facilities mitigation. Therefore, the proposed project would have a less than significant impact on school facilities.

Threshold	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or in the 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 libraries?

Impact 4.13-2 Implementation of the proposed project would increase the demand for library services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand. However, existing services would accommodate growth associated with the proposed project. This impact is *less than significant*.

Implementation of the proposed SGCP would result in the potential for increased demand for library services within the proposed SGCP area, requiring the expansion and construction of new facilities. Utilizing the SCAG population projection ratio of 2.7 persons per dwelling unit (SCAG 2017), population would potentially increase by 27,910 people within the proposed SGCP area.

The libraries throughout the entire City currently provide 563,186 publications, allowing for a volume to resident ratio of 2.79 books per resident. The libraries within the proposed SGCP area include the Central Library, Pacific Park Library, and the Library Connection at Adams Square Branch and have a total of 329,890 volumes. The Glendale General Plan Community Facilities Element suggests maintaining a volume to resident ratio of 1.75 books per resident. To meet this standard, the current City population of 204,072 would need access to 357,126 volumes. With a total projected increase of 27,910 residents, 405,969 volumes would be required to meet City standards under the proposed SGCP.

Development under the proposed SGCP would comply with all local, State, and federal regulations pertaining to library services. In addition, all discretionary projects are subject to environmental review and standard mitigation measures are applied as part of the conditions of approval for the project.

The addition of 27,910 residents would have adequate library services, as the citywide volume per resident ratio is above the City standard. The impact of the proposed SGCP on library services would be less than significant.

Significant and Unavoidable Impacts

Threshold	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or in the 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 fire protection?

Impact 4.13-3 Implementation of the proposed project would increase the demand for fire protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand. As no feasible mitigation is available, impacts for fire protection services would be *significant and unavoidable*.

There are currently 37,903 existing dwelling units within the proposed SGCP area. The proposed SGCP would allow up to 10,337 additional dwelling units within the proposed SGCP area. Utilizing the SCAG population projection ratio of 2.7 persons per dwelling unit (SCAG 2017), population would potentially increase by 27,910 people. The proposed SGCP would contribute to population growth, increasing demands for fire protection.

Additional residents would create additional demand on the GFD, specifically for the three stations located within the proposed SGCP area: Fire Station 21, Fire Station 22, and Fire Station 25. Currently, 153 sworn management and executive department personnel serve the City (GFD 2017). The present fire personnel-to-resident ratio is 0.76 per 1,000 residents (Glendale 2016). The proposed SGCP would increase the citywide population to 231,982, which would increase the fire personnel-to-resident ratio. Thus, the increase in population within the proposed SGCP area would have a potentially significant impact on fire protection services.

NFPA's standard for response time is 240 seconds or less travel time for the arrival of the first arriving engine company at a fire suppression incident. According to City key performance standards, the average time to arrive on scene for fire calls from fiscal year 2015-2016 was 305 seconds. To maintain or achieve acceptable fire protection standards, it is reasonably foreseeable that the provision of new or physically altered fire facilities would be required, which would have the potential to result in adverse environmental impacts. The City does not have any programs in place, which allows the collection of development impact fees to mitigate impacts to fire protection services, including the provision of new or physically altered fire facilities.

Development under the proposed SGCP would comply with all local, State, and federal regulations pertaining to fire protection. In addition, all discretionary projects are subject to environmental review and standard mitigation measures are applied as part of the conditions of approval for the project. The GFD's ability to maintain current workload/service levels would be reduced through a larger population requiring fire protection services. This is considered to be a significant and unavoidable impact. There is no feasible mitigation to reduce the impact; therefore, this impact is considered significant and unavoidable.

Threshold	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or in the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection?

Impact 4.13-4 Implementation of the proposed project would increase the demand for police protection services and would potentially require the construction of new or physically altered facilities to accommodate the increased demand. As no feasible mitigation is available, impacts for police protection services would be *significant and unavoidable*.

The proposed SGCP would allow up to 10,337 additional dwelling units within the proposed SGCP area. Utilizing the SCAG population projection ratio of 2.7 persons per dwelling unit (SCAG 2017), population would potentially increase by 27,910 people. The proposed SGCP would contribute to population growth, increasing demands for police protection services. The GPD provides law enforcement within the proposed SGCP area. The City's police station is located within the proposed SGCP area at 131 N. Isabel Street. The GPD does not have an emergency response time goal, as officers are dispatched to calls based on an officer's proximity to the origin of the call. The demand for police protection services would increase as population grows due to development associated with the proposed SGCP.

Development under the proposed SGCP would comply with all local, State, and federal regulations pertaining to police protection. In addition, all discretionary projects are subject to environmental review and standard mitigation measures are applied as part of the conditions of approval for the project.

The GPD currently has 244 sworn police officer positions to serve the City, which includes the area within the proposed SGCP area resulting in an officer-to-population ratio of 1.2 officers per 1,000 residents (GPD 2017). The standard officer-to-population ratio used by GPD is 2 officers per 1,000 residents. To meet the standard ratio, the current population would require 408 sworn police officers. The addition of 27,910 people within the proposed SGCP area would increase the City population to 231,982. Using an officer-to-population ratio of 2 officers to every 1,000 residents, 464 officers would be needed to serve the increased population, resulting in an added deficiency of police protection services. Current staffing levels do not meet the 2 officers per 1,000 resident standard officer-to-population ratio used by GPD. An increased population allowed by the proposed SGCP would exacerbate this deficiency; thus, the impact to police staffing levels is considered a significant and unavoidable impact. There is no feasible mitigation to reduce the impact; therefore, this impact is considered significant and unavoidable.

Mitigation Measures

There are no feasible mitigation measures that would reduce the impacts associated with fire or police protection services.

Level of Significance After Mitigation

The proposed project would not result in significant impacts related to library and school services due to compliance with State and local regulations. No feasible mitigation exists to reduce impacts to fire protection and police protection services; therefore, impacts would remain significant and unavoidable.

4.13.4 Cumulative Impacts

Threshold	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or in the 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 fire protection and emergency response, police protection, schools, or libraries.

Fire Protection and Emergency Response

Buildout under the proposed project would result in the incremental addition of 27,910 residents within the proposed SGCP area. Cumulative projects in surrounding cities would result in a need for additional fire protection and emergency medical services to serve new development. Cumulative projects within the City, such as commercial, residential or industrial projects, would require fire protection and emergency medical services from fire agencies within the region. In order to maintain adequate service ratios, the construction or expansion of fire protection facilities would be required, which would have the potential to result in an adverse impact on the environment. While the cumulative fire protection projects would undergo environmental review, and would be required to demonstrate compliance with applicable regulations prior to project approval, the resulting need for fire protection services and facilities would incrementally increase, and would potentially result in significant environmental impacts that would have a significant cumulative impact. Therefore, cumulative projects would result in a potentially significant cumulative impact associated with the construction of fire facilities.

The proposed project would impact the GFD's ability to maintain its current emergency medical service response time. The GFD currently exceeds NFPA's response time standards; therefore, the impact of the proposed project on emergency services would be cumulatively considerable and cumulative impacts would be significant and unavoidable.

As discussed above, the development of future projects within the proposed SGCP area would increase demand for fire protection and emergency medical services potentially requiring the provision of new or physically altered fire facilities, having the potential to result in adverse environmental impacts. Therefore, the proposed project would be cumulatively considerable and cumulative impacts on fire protection services would be significant and unavoidable.

Police Protection

Cumulative projects within the proposed SGCP area would require increased police protection services to serve additional residents. Cumulative projects in surrounding cities and counties, such as commercial, residential or industrial projects, would require police services. Projects currently underway in the City, including large residential and commercial developments, would also require police protection services. The increase in demand for police protection services from implementation of cumulative projects would have the potential to result in the need to construct new or expand existing police facilities, which would have the potential to create an adverse impact on the environment. Cumulative projects would undergo environmental review and would be required to demonstrate compliance with applicable regulations prior to project approval. The proposed project would impact the GPD's ability to maintain its current workload/service ratio. The GPD currently has a deficient officer to resident ratio; therefore, the impact of the proposed project on police protection would be cumulatively considerable and cumulative impacts on police protection would be significant and unavoidable.

Schools

Cumulative projects that involve residential development would increase school enrollment within the proposed SGCP area. As discussed above, the development of future land uses as designated within the proposed SGCP area would increase demand for school facilities requiring the provision of new or physically altered school facilities, which would have the potential to result in adverse environmental impacts. Therefore, the proposed project, in combination with the cumulative projects listed in Table 3-3, would cumulatively contribute to a significant impact associated with school facilities. While cumulative projects would undergo environmental review, and would be required to demonstrate compliance with applicable regulations prior to project approval, the need for school facilities would incrementally increase and would have the potential to result in a significant cumulative impact. With the collection of school fees on new residential and commercial uses within the City, the proposed project would not have a cumulatively considerable impact on schools and the impact would be less than significant.

Libraries

Cumulative projects within the city that involve residential development would increase the population of library users. The increase in demand for library services from implementation of cumulative projects would potentially result in the need to construct additional or expand existing library facilities, which would have the potential to create an adverse impact on the environment. Cumulative projects would undergo environmental review, and would be required to demonstrate compliance with applicable regulations prior to project approval. However, the additional 27,910 new residents associated with full buildout of the proposed project would have adequate library services, as the citywide volume per resident ratio would remain above the City standard of 1.75 books per resident. The current book surplus is anticipated to accommodate residents generated as a result of cumulative projects within the City. The impact of the proposed project on library services would be less than significant; therefore, the proposed project would not contribute cumulatively and the impact would be less than significant.

4.13.5 References

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