

4.14 PUBLIC SERVICES

This section describes the public services within whose jurisdiction the Project site is located and evaluates the potential impacts of the proposed Project on public services. This section is based on multiple data sources, including written correspondence and coordination with public service providers (Appendix K). This section addresses the following public services (service providers are noted in parenthesis):

- Fire Protection (Orange County Fire Authority [OCFA])
- Police Protection (Orange County Sheriff's Department [OCSD])
- Public Schools (Saddleback Valley Unified School District [SVUSD])
- Parks (City of Lake Forest)
- Public Libraries (OC Public Libraries [OCPL])

4.14.1 Scoping Process

The City of Lake Forest (City) received 28 comment letters during the public review period of the Initial Study/Notice of Preparation (IS/NOP). For copies of the IS/NOP comment letters, refer to Appendix A of this Environmental Impact Report (EIR). Six letters included comments related to Public Services.

The letter from SVUSD provided generation rates and enrollment and capacity information for the school capacity analysis and provided additional California school siting requirements. The letter from OCFA (July 31, 2018) suggested mitigation measures to reduce potential impacts to fire services. The letter from Orange County Public Works (OCPW) (August 13, 2018) expressed concern about demand on library services based on increase population from the proposed Project and provided information on library service standards.

The letters from Bob Holtzclaw (July 25, 2018) and Charles Larson (August 4, 2018) expressed concern that SVUSD may not use the potential school site. Charles Larson also opined that Foothill Ranch Elementary isn't overcrowded. The letter from the Autumnwood Homeowners Association (August 8, 2018) provided general concerns about potential impacts to public safety services.

4.14.2 Existing Environmental Setting

4.14.2.1 Fire Protection

The City contracts with the OCFA for fire protection services. OCFA is a Joint Powers Authority responsible for reducing loss of life and property from fire, medical, and environmental emergencies. OCFA serves 23 cities in Orange County (County) and all unincorporated areas in the County and protects over 1.8 million residents through its 72 fire stations located throughout the County.

In addition to providing fire, emergency medical, and rescue services, OCFA provides a variety of public services, including:

- Receiving and dispatching emergency calls
- Providing public education programs to schools, businesses, community associations, childcare providers and other members of the community
- Administering a Reserve Firefighter Program
- Adopting and enforcing codes and ordinances relative to fire and life safety issues associated with commercial, industrial, and residential development
- Maintaining a firefighting helicopter used for emergency responses throughout the year;
- Coordinating the inspection of all commercial buildings, investigating all fires, and enforcing hazardous materials regulations
- Working with developers and jurisdictional planning departments on development projects impacting fire protection services, from conception through planning process approval
- Conducting new construction inspections, fire safety inspections, and State Fire Marshal-required inspections (including high-rise, jail, board-and-care, and day care inspections), and enforcing applicable fire codes and ordinances;
- Interacting with developers, architects, and engineers to meet the fire protection requirements for buildings and developments by reviewing all architectural blueprints, development plans, and proposals submitted in OCFA's jurisdiction
- Conducting an inventory program of hazardous materials stored, handled, and used within OCFA's jurisdiction, and maintaining related information on a data base accessible to all emergency response agencies in the event of a major emergency
- Conducting California Fire Code inspections, assisting in reducing risks associated with the use of hazardous materials in the community, and administering the State-mandated Risk Management and Prevention program
- Investigating fires to determine their cause, preparing arson and hazardous materials cases for the District Attorney's Office, and initiating actions to recover costs for negligently caused fires
- Developing and maintaining a fire-safe corridor between the wildland and community developments through fuel modifications and inspections

Lake Forest is in Division V, which includes Battalion 4. Division V serves the cities of Lake Forest, Laguna Woods, Newport Coast, Aliso Viejo, Laguna Hills, Laguna Niguel, and the unincorporated areas of Emerald Bay and Laguna.¹

Fire Station Nos. 19, 42, and 54 are the three OCFA Stations within Lake Forest. Located at 19811 Pauling Avenue, 0.57 mile (mi) east of the Project site, Fire Station No. 54 personnel would be the first to the Project site in the event of an emergency and would therefore be designated as the “first-in” station. Station No. 54 is staffed by three captains, three engineers, and three firefighters. In 2018, the three stations in Lake Forest responded to 5,176 calls.²

“Second call” stations are fire stations that support the “first-in” station. Fire Station Nos. 19 and 42 would be designated as the “second call” stations to support Fire Station No. 54. Fire Station No. 19 is at 23022 El Toro Road, Lake Forest, 2.87 mi southwest of the Project site. Station No. 19 is staffed by three captains, three engineers, and six firefighters. Station No. 42 is at 19150 Ridgeline Road, Lake Forest, 2.46 mi northeast of the Project site. Station No. 42 is staffed by three captains, three engineers, and three firefighters.

In the previous decade, OCFA’s average response time³ for emergency calls remained relatively constant at less than 7 minutes per call.⁴ Response time, which measures the elapsed time between a 9-1-1 call answer and the first fire department unit arrival, is 7:58 (80th percentile) and 9:17 (90th percentile).⁵ The ratio of firefighters per 1,000 residents is almost 6 firefighters per 10,000 residents. Emergency call load also increased by 72 percent during that period. The significant jump in call volume was in part due to Santa Ana joining the OCFA⁶.

4.14.2.2 Police Protection

The City contracts with the OCSO for law enforcement services. According to the OCSO’s website, the OCSO has approximately 3,800 sworn and professional staff members and more than 800 reserve personnel. The Southwest Operations Division and Southeast Operations Division of the OCSO provide law enforcement services to an area encompassing the entire southern portion of the County. The Southeast Operations Division provides law enforcement services to the City. The Southeast Operations Division deploys 65 patrol cars during each 24-hour period. This requires

¹ Orange County Fire Authority, Operations Directory: <https://www.ocfa.org/aboutus/departments/OperationsDirectory/Division5.aspx> (accessed July 23, 2018).

² Orange County Fire Authority, Station Statistics. Website: <https://www.ocfa.org/Uploads/Transparency/OCFA%20Annual%20Report%202018.pdf> (accessed June 18, 2019).

³ OCFA defines response time as the time interval between Dispatch Notification and Arrival on Scene. It includes Dispatch time, Turnout time, and Travel time. Response time goals are established through OCFA policy. Response time performance is generally measured for the first unit on scene (Distribution) and for an Effective Response Force (Concentration). Incident response times are impacted by many variables including availability of first due units, travel distance, traffic, geography, weather, and street networks.

⁴ Orange County Fire Authority Fiscal Year 2018/19 Adopted Budget Website: <https://www.ocfa.org/Uploads/Transparency/OCFA%202018-2019%20Adopted%20Budget.pdf> (Accessed June 10, 2019).

⁵ Ibid.

⁶ Ibid.

approximately 223 staff members, of which 168 are sworn peace officers.¹ OCSD personnel are assigned to the City, including 5 sergeants, 3 investigators, 38 deputies, an investigative assistant, 5 community service officers, and 1 crime prevention specialist. Services to the City are provided out of OCSD's Saddleback Station at 20202 Windrow in Lake Forest, 0.2 mi east of the Project site. The OCSD/Police Services Department embraces the concept of community-oriented policing, which encompasses the active participation of local government, civic and business leaders, residents, schools, churches, and other public and private agencies.

The Federal Bureau of Investigation (FBI) indicates that 1.2 police officers per 1,000 residents is the average ratio for Western-region cities with populations less than 100,000 (FBI 2014). The OCSD does not use a standard officer-to-population or standard response time objective ratio to measure the adequacy of policing levels in Lake Forest. Instead, the OCSD analyzes demographics, service calls, population, crime trends, and other changing factors to determine the level of police protection services needed. The current officer-to-resident ratio in the City is estimated to be 0.54 police officer per 1,000 residents.²

Response times to the Project site depend on various factors, including the location of patrol vehicles at the given moment. Emergency calls receive the quickest response, with alarm calls and non-emergency calls having longer response times. Written correspondence with the OCSD dated July 10, 2019, confirmed that response times for Lake Forest for both Priority 1 (i.e., red light/siren) and Priority 2 (i.e., urgent—no lights/siren) are less than 5 minutes and 7 minutes, respectively.

Planned expansions to police facilities include the planned Community Policing Center being constructed as a part of the new Lake Forest Civic Center and expected to open in summer of 2019. The Schematic Design the City Council approved on September 20, 2016 included an Emergency Operations Center, a deputy sheriff workroom, a dedicated interview room, a dedicated lobby, offices, and a Sheriff's Team of Active Retired Seniors (STARS) work area the Community Policing Center (City of Lake Forest 2016a, 2016b).

4.14.2.3 Public Schools

The provision of education and school facilities in Lake Forest is the responsibility of SVUSD, which enrolled 27,329 students as of the 2017–2018 school year and includes all or part of Lake Forest, Rancho Santa Margarita, Mission Viejo, Foothill Ranch, Laguna Hills, Trabuco Canyon, and Laguna Hills. Governed by a six-member Board of Education—including one student member—SVUSD currently (2017–2018 school year) operates 23 elementary schools (K–6), 1 kindergarten through 12th grade (K–12) school, 4 middle schools (7–8), 4 comprehensive high schools (9–12), 1 alternative education high school, 1 continuation school, 1 special education high school (7–12), and 1 adult school.

¹ Orange County Sheriff's Department. Website. Southeast Operations. Website: <http://www.ocsd.org/divisions/fieldops/southeast> (accessed July 1, 2019).

² There are 46 deputy sheriffs assigned to the City of Lake Forest. According to the California Department of Finance. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011–2014 with 2010 Census Benchmark City/County Population and Housing Estimates, Lake Forest's population in 2018 was 85,048. Therefore, $46/85.048 = 0.54$.

The Project site is not currently included within a specific school attendance boundary. Potential schools serving the Project site would include Portola Hills Elementary School, Lake Forest Elementary School, Foothill Ranch Elementary, Rancho Canada Elementary, Serrano Intermediate School, El Toro High School, and Trabuco Hills High School. Table 4.14.A below shows enrollment and capacity data for SVUSD schools. Foothill Ranch Elementary is the elementary school closest to the Project site (0.7 mi). However, there is an existing shortage of 262 seats at Foothill Ranch Elementary. Lake Forest Elementary is the next in proximity, 1.4 mi from the Project site. There is also an existing shortage of seats at Lake Forest Elementary. Portola Hills Elementary and Rancho Canada Elementary are almost equidistant from the Project site, 1.9 mi and 1.8 mi from the Project site, respectively. As shown in Table 4.14.A, Rancho Canada Elementary has a large surplus of 307 seats. Santiago Elementary is 2.7 mi from the Project site and is not likely to accommodate any students from the proposed Project. Serrano Intermediate School is 2.8 mi from the Project site and El Toro High School and Trabuco Hills High School are 2.3 mi and 1.2 mi, respectively, from the Project site. The intermediate and high schools serving the Project vicinity all have existing surpluses.

**Table 4.14.A: Saddleback Valley Unified School District
Enrollment Capacity**

School Facility	Capacity	Enrollment	Surplus (Shortage) of Seats
Foothill Ranch Elementary	932	1,194	(262)
La Madera Elementary	609	610	(1)
Lake Forest Elementary	755	864	(109)
Olivewood Elementary	455	519	(64)
Portola Hills Elementary	664	653	11
Rancho Canada Elementary	872	565	307
Santiago Elementary	520	368	152
Total Elementary School Capacity	4,807	4,771	34
Serrano Intermediate	1,458	1,169	289
Total Intermediate School Capacity	1,458	1,169	289
El Toro High School	2,754	2,435	319
Trabuco Hills High School	2,943	2,831	112
Total High School Capacity	5,697	5,266	431

Source: Correspondence, "Response to Notice of Preparation of the Nakase Property Area Plan Environmental Impact Report" (SVUSD 2018b).

SVUSD = Saddleback Valley Unified School District

Table 4.14.B shows the number of projected unhoused students from development projects in Lake Forest through calendar year 2027. As shown in Table 4.14.B, there are a total of 2,395 projected unhoused students.

The demand for public school facilities is driven by residential land use. As the Project site does not currently include residential land uses, the existing land use does not create any demand on public school facilities.

Table 4.14.B: Projected Unhoused Students from Future Units

School Level	Projected Students from Future Units ¹	Surplus Seats ²	Projected Unhoused Students
Elementary School	1,657	30	1,627
Intermediate School	455	258	197
High School	956	385	571
Total	3,068	673	2,395

Source: Table 7, Saddleback Unified School District Residential Development School Fee Justification Study (SVUSD 2018c)

¹ Projected students from future units are non-mitigated future units (units of which the developer/applicant has not mitigated their impacts on the school district through the execution of a mitigation agreement wherein such units pay fees separate from school fees and Alternative Fees.)

² Surplus seats were determined based on the total surplus shown in Table 4.14.A, apportioned between the mitigated and non-mitigated future units. Of the surplus seats identified, it was determined that these seats are available to house students generated from non-mitigated future units.

SVUSD = Saddleback Valley Unified School District

4.14.2.4 Parks

Section 4.15, Recreation, provided later in this chapter, contains a detailed discussion related to parks and recreational facilities within Lake Forest. The City maintains and operates 32 public parks, consisting of approximately 280 acres (ac). In addition, Limestone/Whiting Wilderness Park encompasses 1,101 ac of natural land in Lake Forest. Private parks are also distributed throughout Lake Forest in various Planned Communities. According to the City of Lake Forest General Plan Recreation and Resources Element, the City determines the need for park space based on its population. The City requires 5 ac of park space per 1,000 residents. Some school recreational facilities can be used to meet the park goal of 5 ac per 1,000 residents. Up to 50 percent of the school facilities can be used, provided the school facilities are open to the public. Because the Project site does not currently contain residential land uses, the existing land use does not contribute to a demand for park facilities within Lake Forest or Orange County.

4.14.2.5 Public Libraries

The OCPL system provides library services to Orange County, including the Lake Forest, and includes 33 branches, 2 of which are in Lake Forest. The Foothill Ranch Library is at 27002 Cabriole Way, 1 mi northeast of the Project site. The El Toro Library is at 24672 Raymond Way, approximately 4.5 mi southwest of the Project site.

Correspondence with OCPL received November 21, 2018 confirmed that the Foothill Ranch Library is 12,914 square feet (sf), including a Community Room and Friends of the Library space. According to OCPL, resources are limited and need upgrading to meet the needs of a new community. Improvements could include upgraded electrical; wireless internet; furniture; heating, ventilation, and air conditioning; and space. Parking is also limited.

The El Toro Library is 13,940 sf, including a Community Room and the Friends of the Library space. According to OCPL, resources at this library are lacking, as there is no room to add shelving for collections or kiosks for checking out laptops and chargers. The existing community room does not accommodate the programming needs and parking is limited for the building. The library also needs new furniture to accommodate electrical outlets for users.

According to the City of Lake Forest General Plan Public Facilities and Growth Management Element, the City uses a library demand of 0.2 sf of library space per capita. Based on the City's 2018 population,¹ the City has an existing demand for 17,009.2 sf of library space. The Foothill Ranch Library (12,914 sf) and the El Toro Library (13,940 sf) are cumulatively 26,854 sf, which exceeds the demand for library space required by the City's General Plan.

It should also be noted that, according to the Public Services and Facilities Element of the Orange County General Plan, the same standard (i.e., 0.2 sf of library space per capita) has been accepted by the Orange County Board of Supervisors as a planning guide for the purpose of projecting the number and location of new libraries needed.

According to correspondence with OCPL received November 21, 2018, the American Library Association no longer sets quantitative "space per capita standards" for public library buildings and the library demand standard of 0.2 sf of library space per capita is no longer relevant. OCPL's previously adopted volumes per capita standard of 1.5 volumes of books per capita is also no longer used, because the function of the library system has dramatically changed and continues to evolve. According to OCPL, libraries are not "just for books"; communities expect libraries to be used as gathering places, community hubs, a place to go for educational programming and lectures. According to the OCPL, both El Toro and Foothill Ranch branches are at maximum capacity. Because the Project site does not contain residential land uses and does not contribute to the population within Lake Forest, the existing land use does not contribute to a demand on public library facilities within Lake Forest or Orange County.

4.14.2.6 Public Transportation

The proposed Project is within the Orange County Transportation Agency (OCTA) bus service area. OCTA connects Lake Forest with several nearby cities (including Santa Ana, Mission Viejo, Irvine, and Laguna Hills) and several regional destinations such as John Wayne Airport and Irvine Station. OCTA also provides paratransit service through its ACCESS Service. This shared-ride paratransit serves areas within 0.75 mile of an OCTA fixed route service

OCTA currently maintains 3 bus routes, Route 206 on Bake Parkway, 480 on Lake Forest Drive, and 177 on Lake Forest Drive. There is a northbound and southbound bus stop for route 206 on Bake Parkway directly in front of the Project site, a north/south bus stop for route 480 on Lake Forest and Regency, and a north and southbound bus stop for route 177 southeast of the Project site on Town Centre Drive and Alton. Route 85 provides 35 weekday trips per day and 17 Saturday trips.² Route

¹ According to the California Department of Finance. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011–2014 with 2010 Census Benchmark City/County Population and Housing Estimates, the City's population in 2018 was 85,048.

² Orange County Transportation Authority. Bus Book, Route 85. Website: <https://www.octa.net/eabusbook/RoutePDF/route085.pdf> (accessed 6/25/2019)

206 provides 6 weekday trips per day and no weekend trips¹. Route 480 provides 9 weekday trips per day and no weekend trips².

According to the City of Lake Forest Existing Conditions Report, transit ridership in Lake Forest was generally low. The majority of residents in Lake Forest use motor vehicles as the primary mode of travel, and only 2 percent traveled by transit. Transit ridership near the Project site on Routes 206 and 408 were also generally low at approximately 150 to 250 total annual riders at each stop. Transit ridership on the 177 bus route was generally higher from approximately 150 to 1,500 total annual riders at each stop³.

4.14.3 Regulatory Setting

4.14.3.1 Federal Regulations

There are no federal policies or regulations applicable to public services for the proposed Project.

4.14.3.2 State Regulations

Assembly Bills 2926, 1600, and 2751. To assist in providing facilities to serve students generated from new development projects, the State enacted Assembly Bill (AB) 2926 in 1986, which allows school districts to collect impact fees from developers of new residential, commercial, and industrial developments. Development impact fees are also referenced in the 1987 Leroy Greene Lease-Purchase Act, which requires school districts to contribute a matching share of the costs for the construction, modernization, or reconstruction of school facilities. Subsequent legislation has modified the fee structure and general guidelines. In 1987, the provisions of AB 2926 have been expanded and revised by AB 1600, which limits the ability of a school district to levy School Fees unless (i) there is a need for the School Fee revenues generated, and (ii) there is a nexus or relationship between the need for School Fee revenues and the type of development project on which the School Fee is imposed. (The requirements of AB 1600 were clarified with the passage in 2006 of AB 2751, which codifies the findings of *Shapell Industries vs. Milpitas Unified School District*.)

Senate Bill 50 and California Education Code Section 17620. Senate Bill 50 and California Education Code Section 17620. Senate Bill (SB) 50, the Leroy F. Greene School Facilities Act of 1998, was signed into law on August 27, 1998. It is a program for funding school facilities largely based on matching funds. The approval of Proposition 1A authorized funds for SB 50 in the amount of \$9.2 billion, including grants for construction of new schools and modernization of existing schools. The new construction grant provides funding on a 50/50 State and local match basis. The modernization grant provides funding on a 60/40 State and local match basis. Districts that are unable to provide some or all of the local match requirements and are able to meet financial hardship provisions may

¹ Orange County Transportation Authority. Bus Book, Route 206. Website: <https://www.octa.net/ebusbook/RoutePDF/route206.pdf> (accessed 6/25/2019)

² Orange County Transportation Authority. Bus Book, Route 480. Website: <https://www.octa.net/ebusbook/RoutePDF/route480.pdf> (accessed 6/25/2019)

³ City of Lake Forest 2040 Existing Conditions Report. City of Lake Forest. Website: https://static1.squarespace.com/static/5abd4a977e3c3a6cd57d9c48/t/5be09638c2241bf46b6609fb/1541445207077/Chapter+4_Mobility.pdf (accessed 6/24/2019).

be eligible for additional State funding.¹ SB 50 (codified as California Education Code Section 17620) allows the SVUSD to levy a fee, charge, dedication, or other requirement against any development project within its boundaries for the purpose of funding the construction or reconstruction of school facilities. The maximum fee amount that school districts can assess is limited by statutes provided in California Government Code Section 65995. The SVUSD collects the maximum new school construction facility fee at a rate of \$3.79 per square foot of new residential construction.²

The payment of these fees by a developer serves to mitigate all potential impacts on school facilities that may result from implementation of a project to levels that are less than significant (see California Government Code Section 65996). Stated another way, the provisions of SB 50 provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in the California Environmental Quality Act (CEQA) or other State or local laws. The California Department of Education permits local school districts to increase facility fees subject to Department of Education review and with approval of a nexus study from the school District that demonstrates that costs incurred by the school District for the provision of school facilities and services are higher than Level 1 funding provides. In such an instance, a nexus must be demonstrated in the study between the increase proposed by the local school District and the actual cost of provision of school facilities and services.

California Building Code Title 24. Title 24 of the California Code of Regulations, also known as the California Building Code (CBC or Title 24), contains the design standards that govern the construction of buildings in California to “safeguard life or limb, health, property, and public welfare by regulation and controlling the design, construction, quality of materials, use and occupancy, location and maintenance of all buildings and structures and certain equipment.” The 2016 Edition of the CBC contains general building design and construction requirements relating to fire and life safety, structural safety, and access compliance. The Triennial 2016 CBC edition became effective January 1, 2017, and is composed of 12 parts. Part 2 of the CBC outlines building design and construction requirements relating to fire, life safety, and structural safety.

California Fire Code. The California Fire Code (CFC) includes regulations for emergency planning, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution. Several fire safety requirements include: installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildlife hazard areas.

Office of Emergency Services. The State of California passed legislation authorizing the Office of Emergency Services to prepare a Standard Emergency Management System (SEMS) program, which sets forth measures by which a jurisdiction should handle emergency disasters. Non-compliance

¹ State of California. 2007. *Office of Public School Construction, School Facility Program Handbook*, April.

² Saddleback Valley Unified School District Adjustment in Developer Fees. Effective July 9, 2018. https://www.svUSD.org/uploaded/SVUSD_Department_Files/MOC/Documents/2017-18/Developer_Fees_Level_1_Notification_Memo_Levied_July_9_2018_ADA.pdf (accessed 6/21/2019).

with SEMS could result in the State withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster.

4.14.3.3 Regional Regulations

There are no regional policies or regulations applicable to public services for the proposed Project.

4.14.3.4 Local Regulations

City of Lake Forest Municipal Code. The City of Lake Forest Municipal Code includes the following requirements that would apply to the proposed Project related to the provision of public services

- **Section 8.24.010** adopts the 2016 CFC based on the International Fire Code, 2015 Edition, with errata, published by the International Code Council, with appendices and amendments for the purposes of prescribing regulations governing conditions hazardous to the life and property from fire or explosion.
- **Section 8.30.030** adopts the CBC for the purpose of prescribing regulations for the erection, construction, enlargement, alteration, repair, improving, removal, conversion, demolition, occupancy, equipment, use, height, area and maintenance of all buildings and structures per California Building Code, 2016 Edition, based on the 2015 International Building Code as published by the International Code Council with the amendments provided in Section 8.02.020.
- **Section 8.30.020** outlines amendments to the 2016 CBC including modifications to design, plan review, permit, and payment of fee requirements.
- **Section 7.08.145** discusses the requirements for subdivisions in high or extremely high hazard areas including providing appropriate fire protection by means of fire breaks, fuel modification programs, access roads, sufficient water supply, landscaping, and open spaces.

City of Lake Forest General Plan Public Facilities/Growth Management Element. The primary purpose of the Public Facilities/Growth Management Element is to ensure that growth and development correspond to the provision of adequate public facilities. The Public Facilities/Growth Management Element expresses the City's intention to ensure acceptable service levels for public facilities as development occurs. The following policies are relevant to public services:

Policy 3.1: Work closely with Orange County Fire and the Orange County Sheriff's Department in determining and meeting community needs for safety facilities and services.

Policy 3.2: Periodically evaluate level of service to ensure that Lake Forest has appropriate levels of fire, police, and emergency medical services.

Policy 5.1: Work closely with Orange County Library in determining and meeting community needs for library facilities and services, including hours of operation.

Policy 6.1: Work closely with the Saddleback Valley Unified School District in determining and meeting community needs for public education and related activities.

Policy 7.1: Work closely with the County of Orange, Caltrans, surrounding jurisdictions, and other transportation agencies to provide needed transportation facilities.

City of Lake Forest General Plan Safety and Noise Element. The Safety and Noise Element addresses public safety and quality of life issues. The Safety and Noise Element is a comprehensive program to identify and temper environmental factors that potentially threaten community health and safety. The Safety and Noise Element contains policies and programs to regulate existing and proposed development located in hazard-prone areas. The following policies are relevant to public services:

Policy 2.4: Reduce the risk to the community from fire.

Policy 3.1: Provide substantive levels of police protection.

Policy 3.2: Improve public awareness of ways to reduce criminal activity and Orange County Sheriff's Department responsiveness (Neighborhood Watch, improved communication and education methods).

4.14.4 Methodology

Information regarding public services was obtained through the use of questionnaires sent to public agencies in charge of fire, police, library, and school services. Responses were received by OCSD and OCPL on July 10, 2019 and November 21, 2018, respectively. Information for school facilities was provided during project scoping comments in a letter received on July 5, 2018, and in an additional letter dated September 21, 2017 from SVUSD to the City of Lake Forest summarizing activities and discussions between SVUSD and the Project Applicant/Developer. The information from these questionnaires and correspondence is used in tandem with local regulations to determine if the additional demands of the proposed Project would significantly impact the public services that provide for the area. Copies of the letters referenced above are available in Appendix K of this EIR.

4.14.5 Thresholds of Significance

The thresholds for public services impacts used in this analysis are consistent with Appendix G of the *State CEQA Guidelines* and the City's CEQA Significance Thresholds Guide (March 2009). The proposed Project may be deemed to have a significant impact with respect to public services if it would:

Threshold 4.14.1(i): **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

Threshold 4.14.1(ii): 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 police protection

Threshold 4.14.1(iii): 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 schools

Threshold 4.14.1(iv): 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 parks.

Threshold 4.14.1(v): 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 other public facilities

None of the thresholds for public services were scoped out in the Initial Study, which is included in Appendix A. Therefore, all of the thresholds listed above are addressed in the following analysis.

4.14.6 Project Impacts

Threshold 4.14.1(i): Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?

Potentially Significant Impact.

Construction. Construction activities have the potential to affect fire protection services, such as emergency vehicle response times, by potentially requiring partial lane closures during street improvements and utility installation. Mitigation Measure 4.16.1 requires that a Construction Traffic Management Plan (CTMP) be prepared for the proposed Project to ensure that emergency vehicles would be able to navigate through streets adjacent to the Project site that may experience congestion due to construction activities. Mitigation Measure 4.16.1 also requires that all emergency access to the Project site and adjacent areas be kept clear and unobstructed during all phases of demolition and construction. Traffic management personnel (flag persons), required as part of the CTMP, would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. If a partial street closure (i.e., a lane closure) is required, notice would be provided to the OCSF, and flag persons would be used to facilitate the traffic flow until construction is complete. With implementation of Mitigation Measure 4.16.1, potential impacts related to emergency access during construction would be less than significant. No additional mitigation is required.

Construction of the proposed Project could also increase the potential for accidental on-site fires from such sources as the operation of construction equipment and the use of flammable construction materials. As required by Occupational Safety and Health Administration and Fire and Building Code requirements, the construction contractor would be required to carefully store flammable materials in appropriate containers and to immediately and completely clean up spills of flammable materials when they occur. In addition, construction managers and personnel would be trained in emergency response, and fire suppression equipment specific to construction sites would be maintained on site for the duration of the construction period. Adherence to existing laws would ensure that the proposed Project would not have a significant construction impact related to fire. Construction-related impacts to fire protection, emergency medical services, and fire department response times would be less than significant, and no mitigation is required.

Operation. The proposed Project is designed to comply with adopted fire protection standards as required by the City's Municipal Code (Regulatory Compliance Measure [RCM] PS-1). The proposed Project would incorporate fire hydrants, attic sprinkler protection, a fire department access road, radiant heat zone, and ember mitigation zones as part of its fire protection plan. The proposed Project also includes a fire master plan and fuel modification plan, which the OCFA requires prior to issuance of a building permit. The fire master plan identifies standard design features, including the design of fire department connections, and the fuel modification plan identifies the approved fuel modification zones. The design would include fire lanes and entry points so the Project could allow access for firefighting equipment in the event of a fire. These access driveways would be developed in accordance with the code requirements for site access widths to allow for firefighting equipment to adequately enter and exit the Project site. Adherence to applicable codes as described in RCM PS-1 would decrease the demand for fire services and ensure that there is adequate emergency access on site. In addition, as discussed in Section 4.16, the proposed Project would not result in a significant unavoidable traffic impact to any study area intersections. Therefore, the proposed Project would not impair emergency

response vehicles, and average response times in the area would remain within acceptable response time limits.

The population and housing growth anticipated as a result of the proposed 101 senior affordable housing units and 675 single-family residential units, and the associated 2,274 residents generated would incrementally increase demand for fire protection and emergency service calls. To address the increase in demand for fire and emergency medical services, OCFA requires all developers to enter into a secured fire protection agreement with OCFA to ensure the availability of adequate fire protection services. The agreements specify a developer's pro-rata, fair-share funding for capital improvements necessary to establish and maintain adequate fire protection facilities, equipment, and personnel. Mitigation Measure 4.14.1 requires the developer to enter into the secured fire protection agreement prior to issuance of any building permits for the proposed Project. Implementation of Mitigation Measure 4.14.1 would reduce potential impacts related to the Project's demand for fire protection services to a less than significant level. With implementation of Mitigation Measure 4.14.1, the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered government facilities in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection. No mitigation is required.

Threshold 4.14.1(ii): **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?**

Potentially Significant Impact.

Construction. Construction activities have the potential to affect emergency police services by potentially requiring partial lane closures during street improvements and utility installation. Project construction may also necessitate halting traffic to accommodate trucks entering or exiting the Project site during construction (e.g., for the movement of construction equipment). As such, construction activities could temporarily increase response times for emergency vehicles in the vicinity of the Project site. Mitigation Measure 4.16.1 requires that a CTMP be prepared for the proposed Project to ensure that emergency vehicles would be able to navigate through streets adjacent to the Project site that may experience congestion due to construction activities. Mitigation Measure 4.16.1 also requires that all emergency access to the Project site and adjacent areas be kept clear and unobstructed during all phases of demolition and construction. Traffic management personnel (flag persons), required as part of the CTMP, would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. If a partial street closure (i.e., a lane closure) would be required, notice would be provided to the OCSO, and flag persons would be used to facilitate the traffic flow until construction is complete. With implementation of Mitigation

Measure 4.16.1, potential impacts related to emergency access and police response times during construction would be less than significant. No additional mitigation is required.

Operation. The population and housing growth anticipated as a result of the proposed Project would result in additional demand for police protection and emergency service calls such that additional police officers may be required to respond to calls for service. As discussed above, the FBI indicates that 1.2 police officers per 1,000 residents is the average ratio for Western region cities with populations less than 100,000. To provide that staffing level, the proposed Project would require 2.73 additional deputies. To maintain the City's current deputy staffing level with OCSO, the proposed Project would require 1.44 additional deputies. Implementation of the proposed Project would generate additional funding for the City through property tax revenue. These funds could be used for the development of needed facilities, additional personnel, or new equipment, if required. The allocation of additional tax revenues would be at the discretion of City policymakers based on City needs. Additionally, OCSO indicated in a letter dated July 10, 2019 that, upon completion of the proposed Project, the OCSO would be able to adequately serve the proposed Project.

A Neighborhood Watch Program would be established by the applicant/developer on the Project site. Neighborhood Watch Programs prevent crime and create a partnership between law enforcement and the community thereby reducing calls for service. The OCSO recommends that the Project Applicant/Developer to establish a Neighborhood Watch Program in consultation with OCSO. A neighborhood watch would further reduce calls for service. Regardless, the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for police protection.

As discussed above, the OCSO currently maintains a response time of less than 5 minutes for all emergency incidents. The proposed Project would not increase response times by increasing traffic volumes on area roadways to the point where additional significant congestion would occur. As discussed in Section 4.16, Transportation and Circulation, of this EIR, the proposed Project would not result in a significant impact to any study area intersections after implementation of appropriate mitigation measures. As such, traffic from operation of the proposed Project would not contribute to or result in a substantial increase in response times for police or emergency vehicles, and no mitigation is required.

Threshold 4.14.1(iii): **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?**

Less than Significant Impact.

Construction. As detailed throughout this EIR, the proposed Project includes dedication of land to SVUSD for future construction of a public elementary school on the Project site. According to a letter from SVUSD to the City of Lake Forest, a Letter of Intent was presented to the District by the Project Applicant/Developer. Three sites were originally identified as possible school sites on the Project site, and an experienced school architectural firm was hired by the Project Applicant/Developer based on SVUSD's recommendation to provide schematic plans in compliance with California Department of Education (CDE) design guidelines for an elementary school at each site. The Developer also hired a planning and environmental firm to review compliance with the CDE Site Selection and Approval Guide. After review of the options, two sites were submitted to the CDE for review. The CDE Field Representative reviewed the CDE 4.0 submittal and visited the sites. Both sites comply with CDE guidelines, and the initial site evaluation recommended that the District proceed with the sites for further evaluation. After various meetings and discussions, SVUSD provided a draft mitigation agreement that is currently in negotiation by both parties.

To the extent to which details are known, the elementary school is integrated into the proposed Project, and the associated physical environmental impacts are analyzed throughout this EIR. As discussed in Section 4.9, Hazards and Hazardous Materials, additional studies to fulfill school siting requirements were also conducted, including an Electromagnetic Field Study, a Health Risk Assessment, a Geologic and Environmental Hazards Assessment Report, and a Water Pipeline and Tank Safety Hazard Assessment. Potential impacts related to construction of the proposed school would be less than significant with implementation of all applicable mitigation, as detailed in this EIR.

Although the proposed Project would cause a slight increase the number of employees at the Project site during construction, as detailed in Section 4.13 of this EIR, construction workers are not anticipated to change their place of residence as a result of working at the Project site. Therefore, there would be no increase in student enrollment at the schools serving the Project site during construction. Potential impacts related to the provision of school services for construction of the proposed Project would be less than significant.

Operation and School Capacities with No School. Table 4.14.C provides the estimated student enrollment for the proposed Project. The senior affordable housing units are not expected to generate any students; therefore, the table includes only the 675 single-family residential units. While it is likely that some of the students generated by the proposed Project would already reside in the area served by the SVUSD and would already be enrolled in SVUDS schools, for the purposes of this analysis, it is conservatively assumed that all students generated by the proposed Project are not currently enrolled in the SVUSD schools near the Project site but would be enrolled upon relocation to the Project site.

Table 4.14.C: Estimated Student Enrollment

School Level	Single-Family Detached Units	SVUSD Student Generation Factors	Students Generated
Elementary School	675	0.1929	135
Intermediate School	675	0.0654	45
High School	675	0.1459	102
Total		0.4042	282

Source: Public comment letter titled “Response to Notice of Preparation of the Nakase Property Area Plan Environmental Impact Report” (SVUSD 2018b).

SVUSD = Saddleback Valley Unified School District

As shown in Table 4.14.C, the Project would generate an estimated 282 students consisting of 135 elementary school students, 45 intermediate school students, and 102 high school students. As discussed in Section 4.14.2, Existing Environmental Setting, the Project site is not currently included within a specific school attendance boundary. However, potential schools serving the Project site would include Portola Hills Elementary School, Lake Forest Elementary School, Rancho Canada Elementary School, Foothill Ranch Elementary School, Serrano Intermediate School, El Toro High School, and Trabuco High School.

As shown in Table 4.14.A, elementary schools in the SVUSD have 34 seats available. Therefore, elementary schools that could potentially serve the Project site would not have adequate capacity to accommodate the 135 elementary school students the Project is expected to generate. As shown in Table 4.14.D below, the proposed Project would create a shortage of 101 elementary school seats if no school is constructed on the Project site (or elsewhere in the District boundaries). Serrano Intermediate School has a surplus of 289 seats and, therefore, has adequate capacity to accommodate the 45 intermediate school students the Project is expected to generate. High schools in Lake Forest have a surplus of 319 seats and, therefore, would have adequate capacity to accommodate the 102 high school students the Project is expected to generate.

Table 4.14.D: School Seat Shortage/Surplus

School Level	Existing Surplus/ (Shortage)	Students Generated by Proposed Project	Surplus/(Shortage) After Implementation of Proposed Project	
			Without the School	With the School
Elementary School	34	135	(101)	899
Intermediate School	289	45	244	244
High School	431	102	329	329
Totals	754	282	472	1,472

Source: Residential Development School Fee Justification Study (SVUSD 2018c).

SVUSD = Saddleback Valley Unified School District

Pursuant to California Education Code Section 17620(a)(1), the governing board of any school District is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district for the purpose of funding the construction or

reconstruction of school facilities.¹ The Project Applicant/Developer would be required to pay such fees to reduce and/or avoid any impacts of new residential development on school services as provided in California Government Code Section 65995. This requirement may be satisfied through the dedication of land on the Project site to the SVUSD for future construction of a school. Therefore, with implementation of RCM PS-2 requiring the payment of development fees (or dedication of land in lieu of payment of fees), impacts to school services and facilities associated with the proposed Project would be less than significant.

Operation and School Capacities with Proposed School. As detailed above, Table 4.14.C provides the estimated student enrollment for the proposed Project. The senior affordable housing units are not expected to generate any students; therefore, only the 675 single-family residential units are included in Table 4.14.C. As shown in Table 4.14.C, the Project would generate an estimated 282 students, consisting of 135 elementary school students, 45 intermediate school students, and 102 high school students. As shown in Table 4.14.A, elementary schools in the SVUSD have 34 seats available. Therefore, elementary schools that could potentially serve the Project site would not have adequate capacity to accommodate the 135 elementary school students the Project is expected to generate. As shown in Table 4.14.D, the proposed Project would create a shortage of 101 elementary school seats if no school is constructed on the Project site (or elsewhere in the District boundaries).

The proposed elementary school is expected to accommodate 1,000 students, which would reduce impacts on school services and facilities. As shown in Table 4.14.D, with dedication of the proposed school site, the SVUSD would have the ability to add 1,000 elementary school seats, thereby eliminating the shortage of 101 seats resulting from the proposed Project. However, if the SVUSD does not accept the dedication of the school site, the Applicant would pay school fees consistent with California Government Code Section 65995. With dedication of the proposed elementary school site or the payment of any school fees (as required by RCM PS-2), impacts would be less than significant and no mitigation is required.

Threshold 4.14.1(iv): **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?**

Less than Significant Impact. Please refer to Section 4.15, Recreation, of this Draft EIR for a detailed discussion related to the proposed Project's potential impacts to parks and recreational facilities. As discussed in Section 4.15, the provision of onsite parks and recreational facilities would offset the

¹ On January 24, 2018, the State Allocation Board increased the maximum residential School Fee authorized by Section 17620 of the Education Code from \$3.48 to \$3.79 per residential building square foot for unified school districts. Based on the square footage of the average residential unit constructed within SVUSD, the School Fees would provide for less than 100 percent of the school facilities cost impacts. Therefore, the School District is fully justified in levying the maximum residential School Fee of \$3.79 per square foot for all new non-mitigated residential development within its boundaries.

additional demand for parks facilities generated as a result of the addition of 101 senior affordable housing units and 675 single-family residential units. The proposed Project would also be consistent with the City's parkland dedication requirements, as required by RCM REC-1, and impacts on existing park and recreational facilities would be less than significant. Therefore, with the provision of onsite private amenities, the proposed Project would not require the construction of new or expansion of existing construction or expansion of existing recreational facilities to maintain acceptable service ratios or performance objectives. Therefore, the proposed Project's potential impact on parks would be less than significant.

Threshold 4.14.1(v): **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?**

Less than Significant Impact.

Public Libraries.

Construction. Short-term construction activities would not have any impact on the existing OCPL system because there are no nearby libraries that could be impacted by construction activities and construction activities would not generate demand for library services. It is unlikely that the construction workers would increase the demand for library services during the temporary construction of the proposed Project, as most workers would commute directly to and from the Project site for the sole purpose of working on the proposed Project. Therefore, no new libraries would be required to be developed nor would an existing library need to be expanded to provide adequate public library services during proposed Project's construction. Therefore, the proposed Project's potential impact on public libraries during construction would be less than significant.

Operation. Demand for library services is typically determined based on the size of the resident population. As discussed in Section 4.13, Population and Housing, the projected increase in population associated with the proposed 101 senior affordable housing units and 675 single family residential units would be approximately 2,274 persons. As discussed above, the City uses a library demand ratio of 0.2 sf of library space per capita. Based on the City's 2018 population,¹ the City has an existing demand for 17,009.2 sf of library space. The Foothill Ranch Library (12,914 sf) and the El Toro Library (13,940 sf) are cumulatively 26,854 sf, an amount that exceeds the demand for library space the City's General Plan requires. The additional population growth associated with the proposed Project would result in a demand for 454.8 sf of additional library space in the City. Based on the City's demand ratio,

¹ According to the California Department of Finance. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011–2014 with 2010 Census Benchmark City/County Population and Housing Estimates, the City's population in 2018 was 85,048.

this increase in demand for library space can be accommodated by the existing libraries in Lake Forest.

As noted above, OCPL does not use a library demand ratio. According to the OCPL, existing libraries in the City are at maximum capacity and no additional library facilities are currently planned that would mitigate the increase in demand for library services represented by the proposed Project. Because the City has its own adopted demand ratio for libraries, this information is provided for disclosure purposes only.

Implementation of the proposed Project would generate additional funding for the City through property tax revenue the proposed Project would generate. These funds could be used for the development of new or expanded library facilities or new library equipment, if required. The allocation of additional tax revenues would be at the discretion of City policymakers based on City needs.

Regardless, based on the City's library demand ratio, the proposed Project would not require the expansion of existing library facilities in the City in order to maintain acceptable service ratios. Therefore, impacts to public library facilities would be less than significant and no mitigation would be required.

Public Transportation.

Construction. Overall, short-term demolition and construction activities would require minimal use of public transportation, and they are not expected to have any adverse impacts on the availability of the public transportation system. The proposed Project would not require the temporary or permanent relocation of any bus stops, and, consistent with the requirements of the Mitigation Measure 4.16.1, OCTA would be notified regarding any affected bus stop locations or routes a minimum of 10 working days prior to construction so that transit service can be rerouted if deemed necessary in the OCTA's expert opinion. Therefore, impacts related to the provision of public transportation services during construction of the proposed Project would be less than significant, and no mitigation is required.

Operation. Operation of the proposed Project is not anticipated to result in a substantial increase in demand for OCTA services within the city. As previously discussed, the OCTA currently operates a northbound and southbound bus stop for Route 206 on Bake Parkway directly in front of the Project site, a northbound/southbound bus stop for Route 480 on Lake Forest and Regency, and a northbound and southbound bus stop for Route 177 southeast of the Project site on Town Centre Drive and Alton.

As discussed previously, transit ridership in the vicinity of the Project site and Lake Forest overall is generally low. Transit ridership near the Project site on Routes 206 and 408 were also generally low at 150 to 250 total annual riders at each stop. Transit ridership on the 177 bus route was generally higher from 150 to 1,500 total annual riders at each stop. There are numerous trips for Routes 480, 206, and 177 (35 daily weekday trips and 17 Saturday trips for Route 85, 6 weekday trips per day for Route 206, and 9 weekday trips per day for Route

480). Therefore, the proposed Project would not create a public transportation need that requires service expansion, and OCTA would be able to provide adequate services to the proposed Project. Therefore, the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, in order to maintain acceptable service ratios, response times or other performance objectives for public transportation. No mitigation is required.

4.14.7 Cumulative Impacts

As defined in the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for public services. The Project site is a plant nursery in Lake Forest, which is currently not generally served by public service providers because residential uses do not exist on the Project site. The cumulative area for public services is listed below for each individual public service provider.

4.14.7.1 Fire Protection

The geographic area for cumulative analysis of fire protection services is defined as the service territory of Fire Station No. 54. As stated above, Fire Station No. 54 would accommodate the Project's need for fire protection services. Although the proposed Project would increase calls for service, the increase in calls for service is not anticipated to result in an excessive increase in calls for service. Therefore, the proposed Project would not have a cumulatively significant impact on the provision of fire services.

Of the 11 related projects, all would potentially be served by Fire Station No. 54 or Fire Station No. 42. Operation of the related projects are anticipated to increase the overall demand for fire protection services provided by Fire Station No. 54. As discussed in Section 4.13, Population and Housing, the cumulative population and housing growth from the proposed Project and the related projects (4,934 residents and 1,684 housing units, respectively) in Lake Forest would be relatively small compared to the Southern California Association of Governments' (SCAG) projected population increase in Lake Forest and the County. Thus, the proposed Project and the related projects' relatively small increase in population above the SCAG growth forecasts indicates they would be accommodated as part of OCFA's long-term growth planning for fire and other public facilities. Additional demands for fire protection services would be funded by existing funding sources (i.e., property taxes and government funding), to which the proposed Project and related projects would contribute. Additionally, to address the increase in cumulative regional demand for fire and emergency medical services, the OCFA requires all developers to enter into a secured fire protection agreement with OCFA to ensure the availability of adequate fire protection services. The agreements specify a developer's pro-rata fair-share funding for capital improvements necessary to establish and maintain adequate fire protection facilities, equipment, and personnel. Therefore, the proposed Project's contribution to fire protection impacts would not be cumulatively considerable, and no mitigation is required.

4.14.7.2 Police Protection

The geographic area for the cumulative analysis of police protection services is defined as the service area for the OCSD's Southeast Operations Division. Although the proposed Project would result in an increase in calls for service, it would not result in the need for additional or physically altered police facilities.

All 11 related projects are within Lake Forest. As discussed in Section 4.13, Population and Housing, the cumulative population and housing growth from the proposed Project and the related projects in Lake Forest would be relatively small compared to the SCAG forecasted population and housing growth for the city. Additional demands for OCSD services would be funded by existing funding sources (i.e., property taxes and government funding), to which the proposed Project and related projects would contribute. Thus, the proposed Project and the related projects' demand for police services would be accommodated by the City and OCSD's long-term growth planning for police protection services and facilities. Therefore, the proposed Project's contribution to police protection impacts would not be cumulatively considerable, and no mitigation is required.

4.14.7.3 Schools

The geographic area for cumulative analysis of school services is the school district that serves the proposed project (i.e., SVUSD). As discussed above, the proposed Project would not result in significant impacts to school facilities with the implementation of RCM PS-2. However, a cumulative increase in the demand for school services is anticipated to take place with the development of future residential project, the proposed Project itself, and more specifically, the future household growth within the school boundaries currently servicing the Project site. As shown in Table 4.14.E, there is a total of 11 related projects. All related projects are within Lake Forest and within the SVUSD. As Table 4.14.E shows, related projects would generate approximately 204 elementary school students, 61 intermediate school students, and 133 high school students, for a total of 398 students.

As discussed above, the proposed Project would generate an increase of 135 elementary school students, 45 intermediate school students, and 102 high school students, for a total of 282 students. When added to the students generated by the related projects, the cumulative student generation would include 339 elementary school students, 106 intermediate students, and 235 high school students for a total of 680 students overall.

As shown in Table 4.14.F, the intermediate schools and high schools in the area would have adequate capacity to serve the proposed Project and related projects. However, there would be a shortage of 305 elementary school seats without the dedication of the proposed school site. All related projects would be required to fulfill payment of requisite development fees pursuant to California Government Code Section 65995, as described in RCM PS-2. Because the proposed Project and all future related projects would be required to pay school fees as required by RCM PS-2, cumulative impacts that the proposed Project may have on school services would be less than significant. If the school site is developed as proposed, there would be adequate capacity for the cumulative elementary school students generated, which would further reduce impacts to school services and facilities. If the SVUSD does not accept the dedication of the elementary school site,

Table 4.14.E: Estimated Related Project Student Generation

Related Project No.	Land Use	Size	Elementary School	Intermediate School	High School
City of Lake Forest					
1	Private Recreation	2 acres	0	0	0
2	Commercial	Remodeling of existing 1.027 ac	0	0	0
3	Single-family	93 DU	18	6	14
4	Animal Hospital	0.092 acre	0	0	0
5	Religious Facility	2.121 acres	0	0	0
	Classroom	0.389 sf			
6	Single-family	101 DU	19	7	15
7	Townhome condominium duplexes	108 DU	26	7	14
8	Single-family detached homes	85 DU	16	6	12
9	Restaurant	0.039 acre	0	0	0
10	Condominium/ Single-family	521 DU	125	35	78
11	Religious Facility	0.152 acre	0	0	0
Total		908 DU	204	61	133

Note: For multifamily units, the “mutifamily attached” student generation factor was used. For Project 10, because the number of condominium/single-family units has not been determined for a conservative analysis, the greater student generation factor was used (multifamily for elementary school and single-family for intermediate and high school).

DU = dwelling units
sf = square feet

Table 4.14.F: Cumulative Impacts to Saddleback Valley Unified School District

School	Existing Surplus/ (Shortage)	Cumulative Students	Existing Surplus/ (Shortage)	
			Without Proposed Elementary School	With Proposed Elementary School
Elementary School	30	339	(309)	691
Intermediate School	258	106	152	152
High School	385	235	150	250

Source: Residential Development School Fee Justification Study (SVUSD 2018c).
SVUSD = Saddleback Valley Unified School District

the Project Applicant/Developer would pay school mitigation fees, and the proposed Project’s contribution to school impacts would not be cumulatively considerable, and no mitigation is required.

4.14.7.4 Public Library

The geographic area for an assessment of cumulative impacts pertaining to library services is the city of Lake Forest. Of the 11 related projects, only the 5 projects involving residential uses would introduce new residents to the library service area and potentially increase demand for library services. Nonresidential projects are viewed as having relatively limited impacts attributable to occasional and incidental use of library facilities for generalized research purposes. Employees generated by the nonresidential projects would not be expected to patronize local libraries to a measurable extent, as they typically would not have long periods of time during their work to visit

library facilities and would be more likely to use libraries near their homes during non-work hours. The 5 related projects proposing residential uses would generate a total of 2,660 residents and the cumulative increase in residents from the proposed Project in addition to the related projects would be 4,934 residents, as discussed in Section 4.13, Population and Housing. As discussed above, the City uses a library demand ratio of 0.2 sf of library space per capita. Based on Lake Forest's 2018 population,¹ the City has an existing demand for 17,009.2 sf of library space. The proposed Project and the related projects would result in a demand for 986.8 sf of additional library space. As the Foothill Ranch Library (12,914 sf) and the El Toro Library (13,940 sf) are cumulatively 26,854 sf, the existing libraries could accommodate anticipated demand from future projects. Therefore, the proposed Project's contribution to library impacts would not be cumulatively considerable, and no mitigation is required.

4.14.7.5 Public Transportation

The geographic area for the cumulative analysis of transit services is defined as the service territory for the OCTA, which includes all 11 of the related projects. As discussed above, transit ridership in Lake Forest is generally low. Transit ridership on routes 206, 408, and 177 serving the Project site are generally low, and there are numerous trips for each route on weekdays (only Route 85 runs on weekends). With OCTA's ability to meet the future transit demands within the Project area, the increased demand for public transit from the proposed Project in addition to the related projects would create a public transportation need that requires service expansion of the OCTA. Therefore, the proposed Project's contribution to public transportation impacts would not be cumulatively considerable, and no mitigation is required.

4.14.8 Level of Significance Prior to Mitigation

Impacts related to police services, schools, parks, libraries, and public transportation would be less than significant prior to mitigation. The proposed Project would result in potentially significant impacts to fire protection services, and mitigation is required.

4.14.9 Regulatory Compliance Measures and Mitigation Measures

4.14.9.1 Regulatory Compliance Measures

The proposed Project would comply with the following regulatory standards, the implementation of which is intended to reduce impacts related to public services:

RCM PS-1 **City of Lake Forest Municipal Code Section 8.24.010 (California Fire Code Adoption) and Section 7.08.145 (Fire Protection).** Prior to issuance of grading permits for planned structures, the City of Lake Forest Public Works Director, or designee, shall review the building plans to verify that the design conforms to the requirements of the Fire Code as adopted in the City Municipal Code.

¹ According to the California Department of Finance. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011–2014 with 2010 Census Benchmark City/County Population and Housing Estimates, the City's population in 2018 was 85,048.

RCM PS-2 **Payment of School Facility Fees.** Prior to issuance of a building permit, the Project Applicant/Developer shall submit proof of payment of all applicable school facility fees in accordance with Government Code Section 65995 to the Director of the City of Lake Forest Department of Community Development, or designee. This requirement may be satisfied through the dedication of land on the Project site to the Saddleback Valley Unified School District for future construction of a school.

4.14.9.2 Mitigation Measures

Mitigation Measure 4.14.1 **Secured Fire Protection Agreement.** The Project Applicant/Developer shall enter into a Secured Fire Protection Agreement with the Orange County Fire Authority (OCFA). The Secured Fire Protection Agreement shall specify the developer's pro-rata fair-share funding of capital improvements necessary to establish adequate fire protection facilities and equipment, and/or personnel. Evidence of an OCFA-approved agreement shall be submitted to City of Lake Forest Director of Community Development, or designee, prior to issuance of any building permits.

4.14.10 Level of Significance after Mitigation

With implementation of Mitigation Measure 4.14.1, potentially significant impacts would be reduced below a level of significance.

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