5. Environmental Analysis

5.10 PUBLIC SERVICES

This section of the DEIR addresses the potential for implementation of the Sierra Madre General Plan Update (General Plan Update) to impact public services in the City of Sierra Madre, including fire protection and emergency services, police protection, school services, and library services. The analysis in this section is based in part on the service provider letter responses in Appendix D of this DEIR. Park and recreational services are addressed in Section 5.11, *Recreation*. Public and private utilities and service systems, including water, wastewater, and solid waste services and systems, are addressed in Section 5.13, *Utilities and Service Systems*.

5.10.1 Fire Protection and Emergency Services

5.10.1.1 ENVIRONMENTAL SETTING

Regulatory Background

State and local laws, regulations, plans, or guidelines that are potentially applicable to the General Plan Update are summarized below.

State

California Fire Code

The most current (2013) California Fire Code (CFC; California Code of Regulations, Title 24, Part 9), which became effective January 1, 2014, and is adopted by reference in Chapter 15.24 (Fire Code) of the City's Municipal Code, contains among others, provisions related to general safety; emergency planning and preparedness; building equipment and design features; special occupancies and operations; and hazardous materials. The CFC also contains fire safety-related building standards that are referenced in other parts of Title 24 of the California Code of Regulations.

California Health and Safety Code

Sections 13000 et seq. of the California Health and Safety Code include fire regulations for building standards (also found in the California Building Code), 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.

Local

City of Sierra Madre Municipal Code

The following provisions from the City's Municipal Code focus on fire and emergency services impacts associated with new development projects and are relevant to the General Plan Update:

- Title 8 (Health and Safety), Chapter 8.28 (Protected Fire Area). Designates protected fire areas within the City as determined by the Sierra Madre Fire Department and City Council with approval through a public hearing. Regulations in these protected areas include topics such as smoking, outdoor fires, open flame devices, disposal of ashes, use of motor vehicles, etc.
- Title 8 (Health and Safety), Chapter 8.36 (Hazardous Brush Clearance). Ensures that all landowners remove hazardous refuse or weeds, trees, and other vegetation, which, by reason of proximity to a building or structure, constitutes a fire hazard. In cases where property is undeveloped or larger than five acres, a vegetation management plan shall be required.
- Title 15 (Buildings and Construction), Chapter 15.24 (Fire Code). Adopts the most current (2013) California Fire Code, which includes precautionary regulations and standards such as fire retardant roofs, automatic life safety support sprinkler system, fire extinguishers, etc.
- Title 15 (Buildings and Construction), Chapter 15.28 (Fire Zones). Section 15.28.020 of this chapter designates approximately the entire northern half of the City are to be a "Very High Fire Hazard Severity Zone", as determined by the California Department of Forestry and Fire Protection. Therefore, development in this zone requires compliance with California Green Building Standards Codes and various fire-resistive design standards.
- Title 15 (Buildings and Construction), Chapter 15.52 (Public Facilities Fee). Imposes a fee as a condition of issuance of any project permit to mitigate potential impacts of new developments on public facilities.

Existing Conditions

The City of Sierra Madre Fire Department (SMFD) provides fire protection and emergency medical services to a primarily residential area of 2.94 square miles with a wildland/urban interface of approximately 11,000 residents. The City's fire station is centrally located in the downtown area of the City at 242 W. Sierra Madre Boulevard. SMFD participates in a California Mutual Aid Program by providing its resources to the State of California Office of Emergency Services (OES) for combating natural and man-made disasters. Additionally, SMFD has a mutual aid agreement with the US Forest Service, Los Angeles County Fire Department, and the ten other Area C departments, which include the cities of Sierra Madre, Burbank, Pasadena, Glendale, Arcadia, Monrovia, San Gabriel, South Pasadena, Alhambra, and San Marino. Alarm call types are defined as follows:

- First Alarm: Requires aid in the form of 1 truck, 2 engines, 1 rescue ambulance, and a Battalion Chief.
- Second and Third Alarms: Requires aid in the form of an additional truck, 3 engines, and a Battalion Chief. (Heydorff 2011)

Staffing and Equipment

SMFD currently has a staff of 1 fire chief, 1 deputy chief, 2 battalion chiefs, 1 captain/fire marshal, 1 captain/paramedic coordinator, 1 captain/training, 1 part-time captain, 9 engineers (2 volunteers and 7 part-time); and 28 shift/auxiliary firefighters (Heydorff 2015).

SMFD is equipped with 3 Type 1 engines; 1 water tender (3,000 gallons); 2 rescue ambulances; 1 chief's vehicle; 1 command vehicle; and 1 utility truck (Heydorff 2015).

Performance Standards and Statistics

SMFD adheres to the National Fire Protection Association 1710 (NFPA 1710) standard response time goal of 5:00 minute. SMFD's average response times in 2014 were 4:44 minutes for emergency medical services (EMS) calls and 4:44 minutes for fire calls (SMFD 2015).

The Insurance Services Office (ISO) Fire Suppression Rating Schedule measures major elements of a community's fire-suppression system by evaluating fire alarms (including the communication center, telephone service, number of operators/telephone lines, and overall response times), engine companies (testing pumps, hoses, breathing apparatus, and other equipment), and water supply (water supply system, pumps, storage, filtration, etc.). Using this ISO system, SMFD is currently rated 3 (SMFD 2014; with 1 indicating superior fire protection and 10 not meeting ISO's minimum standards), indicating above average fire protection service.

SMFD's call statistics from 2005 to 2014 are summarized and categorized by call type below in Table 5.10-1. As shown in the table, emergency calls have steadily increased over the years, with the number of calls peaking in 2011.

Call Type	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
Fires ¹	34	36	33	36	28	34	27	27	20	34
Other Alarms ²	207	256	219	181	200	181	197	168	234	218
Rescue/EMS ³	447	491	546	634	590	670	742	686	595	647
Total	688	783	798	851	818	885	969	881	849	899

 Table 5.10-1
 Emergency Response Calls by Type in Sierra Madre

Source: Heydorff 2015.

Notes:

¹ Includes structure, equipment/contents, electrical, brush/vegetation, vehicle, rubbish/illegal burn, pole/tree, and food on stove fires.

² Other alarms includes calls for but not limited to natural gas leaks, suspicious odors, hazardous conditions or materials, fuel/oil spills, bomb threats, mutual aid, traffic accidents, and false alarms.

³ Includes rescue and first aid calls.

Funding

Funding for fire and emergency services, facilities, and personnel primarily comes from three main sources:

- General Fund. Fire Suppression and Support: Payments for suppression of fires within the City and other neighboring mutual aid cities.
- General Fund. Fire Prevention and Training: Payments for inspections of business, dwelling units and hillside slopes to ensure fire danger mitigations are implemented, review of building plans to ensure compliance with the state fire code, and public education and training from the community Fire Safe Council.
- **Paramedic/EMS Program.** Payments for advanced and basic emergency medical service and transportation of the sick or injured, and subsidies from the City's General Fund.

According to the City's Annual Budget Report for 2013-2015, proposed General Fund allocations for the 2014-2015 fiscal year for SMFD include \$610,789 for personnel and \$234,982 for equipment (Sierra Madre 2013a). In addition, SMFD also received subsidies in the amount of \$466,583 from the City's General Fund for the Paramedic/EMS Program.

Another source of funding is through the collection of Public Facilities Fees, in accordance with Chapter 15.52 (Public Facilities Fee) of the City's Municipal Code. Pursuant to Chapter 15.52, all new development must pay a Public Facilities Fee to offset the proposed development's potential impact on public facilities demand¹. Public facilities include services such as water, sewer, parks, police, fire, and library services. Fees are collected at the time of issuance of building permits, as outlined in Section 15.52.050 (Timing of Payment).

5.10.1.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

FP-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services.

¹ For purposes of assessing Public Facilities Fees, new development does not include that which replaces existing development, but applies only to additional residential units or non-residential square footage created by new development.

5.10.1.3 RELEVANT GENERAL PLAN POLICIES AND IMPLEMENTATION PROGRAM MEASURES

The following are relevant policies and implementation measures of the General Plan Update and Implementation Program, respectively, which are designed to reduce potential impacts to fire and emergency services as a result of implementation of the General Plan Update.

General Plan Update Policies

Hazard Prevention Element

- **Policy Hz1.1:** Maintain a combination volunteer and paid fighting force.
- **Policy Hz1.2:** Promote public education about fire safety at home, in the community, and in the work place.
- **Policy Hz1.3:** Continue to coordinate the provision of fire services with all public safety service providers and monitor their adequacy and responsiveness to community needs.
- **Policy Hz1.4:** Encourage, facilitate, and participate in, where appropriate, the establishment of methods of communication between the Fire Department and Sierra Madre community members to discuss and resolve issues of responsiveness and sensitivity.
- **Policy Hz2.1:** Continue to require all existing and new development to install and maintain adequate smoke detection systems.
- Policy Hz2.2: Continue to require all new development to install automatic fire sprinkler systems.
- Policy Hz2.3: Continue to require review of building plans by a Fire Captain/Fire Marshal.
- **Policy Hz2.4:** Consider water availability in terms of quantity and water pressure for safety purposes when considering the size and location of new residential construction.
- Policy Hz2.5: Assess the impacts of incremental increases in development density and related traffic congestion on fire hazards and emergency response time, and ensure through the development review process that new development will not result in a reduction of fire protection services below acceptable levels.
- Policy Hz2.6: Continue to require that new development provide adequate hydrants and show sufficient evidence that there is adequate water supply/fire flow and that it is available to accommodate the fire protection needs of new construction.
- Policy Hz2.7: Protect the wild land/urban interface by considering fire hazards when evaluating projects in the canyon areas.

- Policy Hz2.8: Develop vegetation management plans that manage chemise and chaparral to ensure adequate firebreaks, to provide adequate access for fire protection water systems, and access for firefighting.
- Policy Hz2.9: Maintain and update hillside development standards which include fire prevention design measures.
- **Policy Hz2.10:** Work with Public Works, the Police Department and residents to develop a solution to parking issues that affect Fire Department access in the canyon areas.
- Policy Hz3.1: Continue to cooperate with Area C Fire Departments for second and third alarm calls and continue with the State-wide Mutual Aid Agreements.
- Policy Hz3.2: Work with Public Works staff of adjacent jurisdictions to ensure that roadways are adequate for fire equipment.
- **Policy Hz4.1:** Update the Emergency Operations Plan annually.
- **Policy Hz4.2:** Maintain a fully operational Emergency Operations Center.
- **Policy Hz4.3:** Enlist participation from the community and City staff for emergency operations.
- **Policy Hz4.4:** Provide emergency operations training and conduct test runs.
- Policy Hz 4.5: Review and upgrade emergency operations equipment such as 911 equipment, and the police dispatch system as needed to maintain modern levels of service.
- **Policy Hz4.6:** Develop and utilize emergency public communication systems.
- **Policy Hz5.1:** Mandate annual brush removal from April to June.
- **Policy Hz5.2:** Work with community groups in presenting information and trainings regarding wildfire prevention and awareness.
- **Policy Hz5.3:** Promote voluntary efforts in tree trimming, and brush and weed abatement.
- Policy Hz5.4: Identify funds by way of a tree assessment district or "environment fund" or other source
 of funds to pay for vegetation trimming and removal of dead wood on public property and private
 properties where vegetation is creating a canopy over public rights-of-way.

Implementation Program Measures

Fire Safety Implementation Program

- **Measure IM-1:** The City shall continue to provide cost efficient fire and EMS services by maintaining adequate funding and recruiting and retaining qualified personnel.
- Measure IM-2: The City shall provide educational opportunities for the public to learn about fire safety by hosting annual preparedness fairs, fire prevention festivals, brush awareness evenings, and conducting annual inspections and prevention programs at local schools.
- Measure IM-3: The City shall distribute a semiannual newsletter from the Fire Department through social media websites, addressing Fire Prevention issues directly with the community.
- Measure IM-4: The City shall continue to contract dispatch services to Verdugo Dispatch Center and monitor response times through the Verdugo CAD (Computer Aided Dispatch) system.
- **Measure IM-5:** The City shall continue to require adequate fire protection through the adoption of the State Fire Code with local amendments for all developments.
- Measure IM-6: The City shall oversee the maintenance of adequate brush clearance in the Wildland/Urban Interface within the High Severity Fire Zone through annual brush inspections.
- Measure IM-7: The City shall continue to improve response times for Safety Personnel and their equipment in the Canyon areas.
- Measure IM-8: The City shall provide a fully functioning Emergency Operating Center with annual updates for city disasters.
- Measure IM-9: The City shall collaborate with the Arcadia Fire Department and Los Angeles County Road Department and Fire Department in the application of fire retardant and brush clearance along roadways.

5.10.1.4 ENVIRONMENTAL IMPACTS

The following impact analysis addresses thresholds of significance for which the Notice of Preparation (see Appendix A) disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

For the impact analysis of all thresholds below, it should be noted that the large infill opportunity site shown in Figure 3-5, *Infill Opportunity Sites*, just north of Carter Avenue, which is associated with the residential subdivision known as Stonegate, is an approved development project and was analyzed under separate environmental documentation in accordance with CEQA. The impacts to fire protection and emergency services resulting from Stonegate were addressed and mitigated for in that environmental documentation.

Also, all residential lots within Stonegate are subject the provisions of the City's Municipal Code and the Hillside Management zone regulations (Chapter 17.52) of the City's Municipal Code, which requires that each residential development within Stonegate obtain approval of a hillside development permit.

For the purpose of the following analysis, it is also important to note that, based on the requirements of CEQA, this analysis is based on a comparison to existing land uses and does not address the differences that would result from a comparison with the existing General Plan land use map, from which there is little variation when compared to the proposed General Plan land use map.

Furthermore, it is also important to note that while the General Plan Update establishes City-wide policy level guidance, includes a revision to the current land use map (see Figures 3-4, *Current Land Use Map*, and 3-6, *Proposed Land Use Map*), and modifies the development potential of certain parcels in the City (see Figure 3-5, *Infill Opportunity Sites*), it does not contain specific development project proposals. The General Plan Update is a regulatory document that sets forth the framework for future growth and development (e.g., infill development, redevelopment, and revitalization/restoration) in the City and does not directly result in development in and of itself. Before any development can occur in the City, all such development is required to be analyzed for conformance with the City's General Plan, zoning requirements, and other applicable local and state requirements; comply with the requirements of CEQA (e.g., preparation of site-specific environmental documentation in accordance with CEQA); and obtain all necessary approvals, clearances, and permits.

Impact 5.10-1: Future development in accordance with the General Plan Update would introduce new structures, residents, and workers into the Sierra Madre Fire Department service boundaries, thereby increasing the requirement for fire protection facilities and personnel. [Threshold FP-1]

Impact Analysis: Future development in accordance with the General Plan Update would result in a slight increase in demand for fire protection services within the City. Future development is anticipated to create the typical range of fire service calls that other similar uses create, such as structure fires, garbage bin fires, car fires, various accidents causing injuries or medical emergencies, and electrical fires. New facilities, equipment, and personnel may be necessary to maintain adequate levels of service. At buildout under the General Plan Update, the City is anticipated to result in an increase of approximately 121 residential units and 277 new residents, as well as an increase of 87,392 square feet of nonresidential uses and 124 new workers (see Table 3-5, *General Plan Update Summary of Changes in Land Use from Existing Conditions*). The population and employment growth is a nominal increase from existing conditions and therefore, would only slightly increase the demand for fire protection and emergency services.

Future growth under the General Plan Update is expected to marginally increase the number of fire and emergency service calls, and possibly increase the need for new fire facilities, apparatus, and personnel in order to maintain adequate response times. However, according to SMFD, the General Plan Update would not cause a substantial change to SMFD's current level of service since the City's boundaries would remain the same and population growth would not be substantial. Additionally, SMFD's current equipment needs, equipment replacement schedule, and staffing levels are sufficient to provide adequate levels of service to

Sierra Madre (Heydorff 2015). Considering the existing firefighting resources available in and near the City, project impacts on fire protection and emergency services are not expected to occur.

Additionally, if increased demand for additional personnel, facilities, and operational costs do emerge do to buildout of the General Plan Update, the costs would be funded and offset through the increased tax revenue generated and deposited into the City's General Fund (in which SMFD receives annual funding) from the additional development that would be accommodated under the General Plan Update. According to the City's Annual Budget Report for 2013-2015, proposed General Fund allocations for the 2014-2015 fiscal year for SMFD include \$610,789 for personnel and \$234,982 for equipment (Sierra Madre 2013a).

Individual development projects within the City would also be reviewed by the City and SMFD and would be required to comply with the requirements in effect at the time building permits are issued, including the payment of Public Facilities Fees in accordance with Chapter 15.52 (Public Facilities Fee) of the City's Municipal Code. During the City's development review process, applicants of future developments under the General Plan Update would be required to comply with the requirements in effect at the time building permits are issued, including payment of the required Public Facilities Fee, as outlined in Section 15.52.050 (Timing of Payment). As stated in Section 15.52.070 (Special Fund), the fees go into a special fund, entitled the "public facilities fee fund", which are to be expended only on the installation, acquisition, construction and improvement of eligible facilities.

The City also involves SMFD in the development review and permitting process in order to ensure that the necessary fire prevention and emergency response features are incorporated into development projects. For example, SMFD would review and approve individual development projects to ensure that adequate facilities, infrastructure, and access are provided to serve the needs of SMFD in the case of emergency. Individual development projects would also be required to incorporate adequate fire protection into building plans in order to comply with the 2010 California Fire Code adopted by SMFD, as outlined in Chapter 15.24 (Fire Code) of the City's Municipal Code. Furthermore, building inspections by SMFD would ensure all new developments incorporate fire safety features and designs. Specific fire and life-safety requirements for the construction phase of future development projects that would be accommodated under the General Plan Update would be addressed during the building and fire plan check review for each development project. Therefore, all development projects within the City would be required to comply with the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards of Sierra Madre, Los Angeles County, and the State of California.

Finally, the General Plan Update and Implementation Program include policies and implementation measures that would help reduce impacts of potential development projects on fire and emergency services. Following are some of these policies and implementation measures (refer to Section 5.10.1.3, *Relevant General Plan Policies and Implementation Program Measures*, for a complete list of applicable policies and implementation measures):

- Hazard Prevention Element Policy Hz1.1: Maintain a combination volunteer and paid fighting force.
- Hazard Prevention Element Policy Hz1.3: Continue to coordinate the provision of fire services with all public safety service providers and monitor their adequacy and responsiveness to community needs.

- Hazard Prevention Element Policy Hz2.5: Assess the impacts of incremental increases in development density and related traffic congestion on fire hazards and emergency response time, and ensure through the development review process that new development will not result in a reduction of fire protection services below acceptable levels.
- Hazard Prevention Element Policy Hz2.6: Continue to require that new development provides adequate hydrants and show sufficient evidence that there is adequate water supply/fire flow and that it is available to accommodate the fire protection needs of new construction.
- Hazard Prevention Element Policy Hz 4.5: Review and upgrade emergency operations equipment such as 911 equipment, and the police dispatch system as needed to maintain modern levels of service.
- **Fire Safety Implementation Measure IM-1:** The City shall continue to provide cost efficient fire and EMS services by maintaining adequate funding and recruiting and retaining qualified personnel.
- Fire Safety Implementation Measure IM-2: The City shall provide educational opportunities for the public to learn about fire safety by hosting annual preparedness fairs, fire prevention festivals, brush awareness evenings, and conducting annual inspections and prevention programs at local schools.
- Fire Safety Implementation Measure IM-6: The City shall oversee the maintenance of adequate brush clearance in the Wildland/Urban Interface within the High Severity Fire Zone through annual brush inspections.
- Fire Safety Implementation Measure IM-7: The City shall continue to improve response times for Safety Personnel and their equipment in the Canyon areas.
- Fire Safety Implementation Measure IM-8: The City shall provide a fully functioning Emergency Operating Center with annual updates for city disasters.

For these reasons, future development that would be accommodated by the General Plan Update, any land use changes proposed under the General Plan Update, and any new or updated policies of the General Plan Update are not anticipated to create a significant impact on fire protection and emergency services.

5.10.1.5 EXISTING REGULATIONS

State

- California Fire Code (California Code of Regulations, Title 24, Part 9)
- California Health and Safety Code

Local

City of Sierra Madre Municipal Code

- Title 8 (Health and Safety), Chapters 8.28 (Protected Fire Area) and 8.36 (Hazardous Brush Clearance)
- Title 15 (Buildings and Construction), Chapters 15.24 (Fire Code), 15.28 (Fire Zones), and 15.52 (Public Facilities Fee)

5.10.1.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon compliance with the regulatory requirements and implementation of the General Plan Update policies and Implementation Program measures, the following impacts would be less than significant: 5.10-1.

5.10.1.7 MITIGATION MEASURES

Impacts are less than significant and mitigation measures are not required.

5.10.1.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No mitigation measures are required. Therefore, no significant unavoidable adverse impacts relating to fire protection and emergency services remain.

5.10.2 Police Protection

5.10.2.1 ENVIRONMENTAL SETTING

Regulatory Background

Local laws, regulations, plans, or guidelines that are potentially applicable to the General Plan Update are summarized below.

Local

City of Sierra Madre Municipal Code

The following provisions from the City's Municipal Code focus on police services impacts associated with new development projects and are relevant to the General Plan Update:

- Title 2 (Administration and Personnel) Chapter 2.60 (Reserve Police Force). Organizes a reserve police force of a maximum of 25 volunteer members appointed by the Chief of Police to assist Sierra Madre Police Department with enforcement of the law and maintenance of peace and order.
- Title 15 (Buildings and Construction) Chapter 15.52 (Public Facilities Fee). Imposes a fee as a condition of issuance of any project permit to mitigate potential impacts of new developments on public facilities.

Existing Conditions

The Sierra Madre Police Department (SMPD), which operates out of its headquarters at 242 W. Sierra Madre Boulevard, provides police protection to the City of Sierra Madre. In addition to crime prevention, SMPD also enforces and monitors traffic violations, investigates crimes, and handles code enforcement in the absence of the City's Code Enforcement Officer. SMPD also participates in a mutual-aid agreement with Los Angeles County under the California Mutual Aid Program. Under the agreement, SMPD is available on an asneeded basis to the Los Angeles County Sheriff's Department. On a day-to-day basis, SMPD is also available to assist local agencies as part of a mutual-aid agreement with the cities of Pasadena, Arcadia, and Monrovia.

Staffing

SMPD has full- and part-time personnel that are supported by reserve police members. Current SMPD fulltime staffing as follows: 1 Director of Public Safety, 1 captain, 4 sergeants, 1 corporal, 10 police officers, and 4 dispatch/desk officers. They are supported by part-time staff including 3 police officers, 2 cadets, 4 community services officers (CSO), 1 administrative assistant, 1 dispatch/desk officers, 1 property room officer, and 1 records clerk. In total there are 21 full-time and 13 part-time police department employees (SMPD 2014). Additionally, pursuant to Chapter 2.60 (Reserve Police Officers) of the City's Municipal Code, 5 reserve police officers volunteer their time by assisting with a variety of law enforcement duties, from providing additional staffing at special City functions to assisting after natural disasters. Furthermore, SMPD has 18 volunteers that donate their time to perform administrative tasks and assist in community events (SMPD 2013), in accordance with Chapter 2.60 of the City's Municipal Code. SMPD does not use an officerto-resident population ratio. Instead, SMPD staffs one supervisor and one officer per shift based primarily on expected call volume (Giannone 2014).

Funding

Funding for the City's police services are provided by various means, including the City's General Fund. According to the City's Annual Budget Report for 2013-2015, proposed General Fund allocations for the 2014-2015 fiscal year for SMPD is \$3,421,315 for police personnel (including benefits) and \$436,838 for police supplies and services, totaling to \$3,858,153 (Sierra Madre 2014). SMPD also receives additional funding from the following state and federal resources (SMPD 2014):

- Asset Forfeiture Fund. Derived from illegal drug-related assets seized in the course of narcotic investigations through the federal and state government.
- Citizens Option for Public Safety Fund. Obtained from a half-cent sales tax (Proposition 172) that California voters passed in 1993 and are designated for local public safety.
- State Homeland Security Fund. Federal funding passed through the state and onto the City, allocated most recently to ensure radio operability for countywide public safety agencies.
- Seat Belt Compliance Fund. Derived from a state grant to reimburse police departments for citing motorists for seatbelt violations.

- 911 Fund. State grant providing reimbursement for some costs associated with 911 emergency communication systems.
- **DUI (Driving under Influence) Enforcement Fund.** Los Angeles County fund offering reimbursement for overtime when officers are assigned for one night to a regional DUI task force.
- Movie Details Fund. Provides overtime pay for officers assigned to filming jobs as mandated by the Sierra Madre Municipal Code.
- Police Donation Fund. Consists of donations from groups and individuals to SMPD, used primarily for youth-related activities.

Another source of funding is through the collection of Public Facilities Fees, in accordance with Chapter 15.52 (Public Facilities Fee) of the City's Municipal Code. Pursuant to Chapter 15.52, all new development must pay a Public Facilities Fee to offset the proposed development's potential impact on public facilities demand². Public facilities include services such as water, sewer, parks, police, fire, and library services. Fees are collected at the time of issuance of building permits, as outlined in Section 15.52.050 (Timing of Payment).

Performance Standards and Statistics

SMPD's call load statistics from 2010 to 2014 are shown in Table 5.10-2. As shown in the table, calls for service have steadily increased over the years. Currently, average response times are 3:31 for Priority One Calls (highest priority needing emergency response), 4:13 for Priority Two Calls (less important, usually miscellaneous calls for service), and 4:48 for Priority Three Calls (typically report type calls) (SMPD 2014).

	2010	2011	2012	2013	2014
Calls for Service	4,696	4,834	4,143	4,252	4,287
Self-Initiated Activity	8,444	10,212	10,043	9,137	10,236
Totals	13,140	15,046	14,186	13,389	14,523

Table 5.10-2	Call Load Statistics 2006-2011

Crime statistics for 2013 and 2014, which are the latest available statistics from SMPD, are presented in Tables 5.10-3 and 5.10-4. SMPD classifies crimes into two categories: Part 1 offenses consist of seven major felony crimes, including homicide, rape, robbery, assaults and burglary, theft, and auto theft; Part 2 offenses consist of all other crimes, mainly other felonies, misdemeanors, and local ordinance violations. As shown in Table 5.10-3, the total number of crimes was up 14.94 percent in 2014, as compared to 2013.

² For purposes of assessing Public Facilities Fees, new development does not include that which replaces existing development, but applies only to additional residential units or non-residential square footage created by new development.

	2013	2014	Percent Change
Total Crimes Reported	890	1,023	14.94
Total Arrests	345	417	20.87
Adult Felony	36	46	27.78
Adult Misdemeanor	282	338	19.86
Juvenile Felony	0	0	_
Juvenile Misdemeanor	4	9	125
Warrant Arrests	47	24	110.63
All Other Arrests	176	189	6.87
Source: SMPD 2011 and 2012.	·		•

Table 5.10-3Total Crime Statistics for 2013-2014

Table 5.10-4Crime Offense Statistics for 2013-2014

	2013	2014	Percent Change
Part 1 Crimes			
Homicide	0	0	0
Rape	1	2	100.0
Robbery	1	0	-100.0
Assaults	28	26	-7.14
Burglary	58	25	-56.90
Thefts	66	67	1.52
Motor Vehicle Theft	8	5	-37.50
Other Crimes		•	•
Weapons Offenses	3	2	-33.33
Prostitution/Sex Offenses	6	9	50
Offenses Against Family	3	6	100
Driving Under the Influence	23	44	91.30
Liquor Laws/Drunkenness	22	26	18.18
All Other Offenses	651	784	20.43
Source: SMPD 2012.		·	

5.10.2.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

PP-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services.

5.10.2.3 RELEVANT GENERAL PLAN POLICIES AND IMPLEMENTATION PROGRAM MEASURES

The following are relevant policies and measures of the General Plan Update and Implementation Program, respectively, which are designed to reduce potential impacts to police protection and services as a result of implementation of the General Plan Update.

General Plan Update Policies

Community Services Element

- **Policy C1.1:** Provide professional police response and protection to the community by partnering with residents, business persons and visitors to the City.
- **Policy C1.2:** Assess the impact of increases in population on response time, calls for service and traffic through the development review process so law enforcement assets will not be degraded.
- **Policy C2.1:** Maintain and enhance public awareness and participation in crime prevention in residential and business areas.
- Policy C2.2: Expand existing programs that deal with personal safety such as police-sponsored safety courses and neighborhood/business watch programs.
- **Policy C2.3:** Educate selected groups such as seniors pertaining to crime directed at them.
- Policy C3.1: Evaluate on a continual basis the delivery of police services to monitor their adequacy and responsiveness to community needs.
- Policy C3.2: Encourage an open dialogue with the community to address the concerns of residents, visitors and business owners to resolve issues of responsiveness and sensitivity.
- **Policy C3.3:** Involve other City departments when necessary to resolve matters that fall outside the scope of law enforcement or code enforcement activity.
- **Policy C3.4:** Continually evaluate the training of law enforcement personnel and their interaction with the citizens of Sierra Madre.
- **Policy C4.1:** Educate residents, businesses and visitors about disaster preparedness.
- Policy C4.2: Train law enforcement and all other staff on their role in disaster response and recovery.
- Policy C4.3: Maximize passive prevention measures for new and existing development through the development review process.

- **Policy C4.4:** Work with Sierra Madre's Community Emergency Response Team to have a unified and coordinated response to disasters.
- Policy C4.5: Coordinate with Sierra Madre's Emergency Radio Station (1630 AM), so that when disaster strikes, information can be quickly disseminated to the Community.
- **Policy C5.1:** Maintain a code enforcement officer in the Police Department or in the Planning and Community Preservation Department who is charged with the duty of identifying violations and enforcing City Codes.
- **Policy C5.2:** Attempt to obtain voluntary code compliance within reasonable time frames prior to taking legal action.
- Policy C5.3: Utilize nuisance abatement procedures and legal action through the criminal court system when voluntary code compliance is not effective.
- **Policy C5.4:** Respond to complaints from the public in a timely manner.
- Policy C5.5: Conduct targeted, pro-active code enforcement of violations involving matters of concern to the community.

Implementation Program Measures

Law Enforcement Implementation Program

- **Measure IM-1:** The City will seek to respond to all calls for service within three minutes of a dispatched call. The City will also increase the number of monthly neighborhood watch meetings throughout the City and will hold bi-annual community Town Hall meetings to educate the community and senior citizens on crime prevention.
- Measure IM-2: The City will review all proposed tract maps and multi-family development to assess the impact of increases in population on response time, calls for service and traffic.
- Measure IM-3: The City will seek to identify more Neighborhood Watch block captains & Business Watch participants to increase crime prevention awareness and vigilance.
- Measure IM-4: The City will partner with other City departments to facilitate their notification and/or response to citizen request for service traditionally outside the normal course and scope of the Police Department.
- Measure IM-5: The City will conduct regular quality of service audits with citizens who have interaction with police personnel. The quality of service audits will help identify issues of concern with overall quality of police service, and help determine critical training needs that may be needed to enhance the

overall service by police personnel. In addition, ongoing training will be provided to police personnel in community policing and human relations.

- Measure IM-6: The City will partner with Community Emergency Response Team (CERT) volunteers to provide regular public safety and disaster preparedness training to citizens during neighborhood watch meetings, town hall meetings, and business watch meetings. In addition, efforts will be made to encourage all citizen and visitors to the City to participate in disaster preparedness programs sponsored by the Fire Department and CERT.
- **Measure IM-7:** The City will provide, with the assistance of the Community Emergency Response Team (CERT), community education programs in emergency response and disaster preparedness for City residents.
- Measure IM-8: The City will train all sworn police personnel and all other staff on the implementation of Standardized Emergency Management System (SEMS) plan to address disasters such as earthquakes, flooding, fire, extreme weather, hazardous material spills, and other accidents.
- **Measure IM-9:** The City will develop and maintain an Emergency Operations Plan and Natural Hazard Mitigation Plan, and will update it as needed.
- Measure IM-10: The City will partner with the Fire Department, Community Emergency Response Team (CERT) and Emergency Radio Station 1630 AM volunteers to coordinate disaster response and dissemination of information during a disaster.
- Measure IM-11: City will review existing ordinances and amend as necessary to incorporate hazard prevention measures for new and existing development.
- Measure IM-12: The City will continue to maintain a Code Enforcement Officer to respond to complaints from the public in a timely manner and ensure compliance with City codes and regulations.
- **Measure IM-13:** The City will work with residents and business owners to ensure code compliance in order to avoid the need for legal action. When such efforts have been exhausted, the City will follow Code Enforcement procedures to resolve violations.
- Measure IM-14: The City will identify and address Code violations that warrant pro-active, targeted Code enforcement efforts.

5.10.2.4 ENVIRONMENTAL IMPACTS

The following impact analysis addresses thresholds of significance for which the Notice of Preparation (see Appendix A) disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

For the impact analysis of all thresholds below, it should be noted that the large infill opportunity site shown in Figure 3-5, *Infill Opportunity Sites*, just north of Carter Avenue, which is associated with the residential subdivision known as Stonegate, is an approved development project and was analyzed under separate environmental documentation in accordance with CEQA. The impacts to police protection and services resulting from Stonegate were addressed and mitigated for in that environmental documentation. Also, all residential lots within Stonegate are subject the provisions of the City's Municipal Code and the Hillside Management zone regulations (Chapter 17.52) of the City's Municipal Code, which requires that each residential development within Stonegate obtain approval of a hillside development permit.

For the purpose of the following analysis, it is also important to note that, based on the requirements of CEQA, this analysis is based on a comparison to existing land uses and does not address the differences that would result from a comparison with the existing General Plan land use map, from which there is little variation when compared to the proposed General Plan land use map.

Furthermore, it is also important to note that while the General Plan Update establishes City-wide policy level guidance, includes a revision to the current land use map (see Figures 3-4, *Current Land Use Map*, and 3-6, *Proposed Land Use Map*), and modifies the development potential of certain parcels in the City (see Figure 3-5, *Infill Opportunity Sites*), it does not contain specific development project proposals. The General Plan Update is a regulatory document that sets forth the framework for future growth and development (e.g., infill development, redevelopment, and revitalization/restoration) in the City and does not directly result in development in and of itself. Before any development can occur in the City, all such development is required to be analyzed for conformance with the City's General Plan, zoning requirements, and other applicable local and state requirements; comply with the requirements of CEQA (e.g., preparation of site-specific environmental documentation in accordance with CEQA); and obtain all necessary approvals, clearances, and permits.

Impact 5.10-2: Future development in accordance with the General Plan Update would introduce new residents and workers into the Sierra Madre Police Department service boundaries, thereby increasing the requirement for police protection facilities and personnel. [Threshold PP-1]

Impact Analysis: The General Plan Update would allow for a total (buildout) of 5,244 residential dwelling units and 1,100,228 square feet of nonresidential building space in the City. When compared to existing conditions (5,123 dwelling units and 1,012,836 square feet), this is an increase of 121 dwelling units and 87,392 square feet of nonresidential building space, which would in turn slightly increase resident (approximately 277) and worker (approximately 124) populations in SMPD's service boundary (see Table 3-5, *General Plan Update Summary of Changes in Land Use from Existing Conditions*). As a result of the increased resident and worker populations, additional police equipment, facilities, and personnel may be required to provide adequate response times, acceptable public service ratios, and other performance objectives for law enforcement services within the City.

Given the City's existing population of 11,094 residents and SMPD's 21 sworn officers, the current sworn officer-to-resident ratio is approximately 1.90 officers per 1,000 residents. Using the current ratio of officers to residents, one additional officer would be needed at buildout of the General Plan Update to maintain the

existing officer-to-residents ratio. However, SMPD does not base service needs strictly on population ratios because such ratios do not properly reflect the need for police services. Indicators of need for additional resources and staffing include response times, incident loads, request for service, resident and transient population, and square footage of improvements. Instead, SMPD staffs the levels of one supervisor and one officer per shift based primarily on call volume estimates (Giannone 2014). SMPD also has 18 volunteers that donate their time to perform administrative tasks and assist in community events (SMPD 2014), in accordance with Chapter 2.60 (Reserve Police Force) of the City's Municipal Code. Given that the increase in resident and worker populations under the General Plan Update would be nominal increases of 277 residents and 124 workers, SMPD services would not be greatly impacted by the buildout of the General Plan Update.

Additionally, if increased demand for additional personnel, facilities, and operational costs do emerge due to buildout of the General Plan Update, the costs would be funded and offset through the increased tax revenue generated and deposited into the City's General Fund (in which SMPD receives annual funding) from the additional development that would be accommodated under the General Plan Update. According to the City's Annual Budget Report for 2013-2015, proposed General Fund allocations for the 2014-2015 fiscal year for SMPD is \$3,421,315 for police personnel (including benefits) and \$436,838 for police supplies and services, totaling to \$3,858,153 (Sierra Madre 2014). As discussed above, SMPD also receives additional funding from a number of state and federal resources, including the Asset Forfeiture Fund, Citizens Option for Public Safety Fund, State Homeland Security Fund, Seat Belt Compliance Fund, 911 Fund, DUI Enforcement Fund, Movie Details Fund, and Police Donation Fund (SMPD 2011).

Furthermore, individual development projects that would be accommodated under the General Plan Update would be reviewed by the City and be required to comply with the requirements in effect at the time building permits are issued, including the payment of Public Facilities Fees in accordance with Chapter 15.52 (Public Facilities Fee) of the City's Municipal Code. As stated in Section 15.52.070 (Special Fund), the fees go into a special fund, entitled the "public facilities fee fund", which are to be expended only on the installation, acquisition, construction and improvement of eligible facilities.

Finally, the General Plan Update and Implementation Program include policies and measures that would help maintain adequate levels of services and reduce impacts of potential development projects on police services. Specific policies and measures provided in the General Plan Update and Implementation Program, respectively, include:

General Plan Update Policies

- **Community Services Element Policy C1.1:** Provide professional police response and protection to the community by partnering with residents, business persons and visitors to the City.
- **Community Services Element Policy C1.2:** Assess the impact of increases in population on response time, calls for service and traffic through the development review process so law enforcement assets will not be degraded.

- **Community Services Element Policy C2.1:** Maintain and enhance public awareness and participation in crime prevention in residential and business areas.
- **Community Services Element Policy C2.2:** Expand existing programs that deal with personal safety such as police-sponsored safety courses and neighborhood/business watch programs.
- **Community Services Element Policy C4.4:** Work with Sierra Madre's Community Emergency Response Team to have a unified and coordinated response to disasters.
- Law Enforcement Implementation Measure IM-1: The City will seek to respond to all calls for service within three minutes of a dispatched call. The City will also increase the number of monthly neighborhood watch meetings throughout the City and will hold bi-annual community Town Hall meetings to educate the community and senior citizens on crime prevention.
- Law Enforcement Implementation Measure IM-2: The City will review all proposed tract maps and multi-family development to assess the impact of increases in population on response time, calls for service and traffic.
- Law Enforcement Implementation Measure IM-5: The City will conduct regular quality of service audits with citizens who have interaction with police personnel. The quality of service audits will help identify issues of concern with overall quality of police service, and help determine critical training needs that may be needed to enhance the overall service by police personnel. In addition, ongoing training will be provided to police personnel in community policing and human relations.
- Law Enforcement Implementation Measure IM-6: The City will partner with Community Emergency Response Team (CERT) volunteers to provide regular public safety and disaster preparedness training to citizens during neighborhood watch meetings, town hall meetings, and business watch meetings. In addition, efforts will be made to encourage all citizen and visitors to the City to participate in disaster preparedness programs sponsored by the Fire Department and CERT.

For these reasons, future development that would be accommodated by the General Plan Update, any land use changes proposed under the General Plan Update, and any new or updated policies of the General Plan Update are not anticipated to create a significant impact on police protection and services.

5.10.2.5 EXISTING REGULATIONS

City of Sierra Madre Municipal Code

- Title 2 (Administration and Personnel), Chapter 2.60 (Reserve Police Force)
- Title 15 (Building and Construction), Chapter 15.52 (Public Facilities Fee)

5.10.2.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon compliance with the regulatory requirements and implementation of the General Plan Update policies and Implementation Program measures, the following impacts would be less than significant: 5.10-2.

5.10.2.7 MITIGATION MEASURES

Impacts are less than significant and mitigation measures are not required.

5.10.2.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No mitigation measures are required. Therefore, no significant unavoidable adverse impacts relating to police protection remain.

5.10.3 School Services

5.10.3.1 ENVIRONMENTAL SETTING

State and local laws, regulations, plans, or guidelines that are potentially applicable to the General Plan Update are summarized below.

Regulatory Background

State

California State Assembly Bill 2926: School Facilities Act of 1986

To assist in providing school facilities to serve students generated by new development, Assembly Bill (AB) 2926 was enacted in 1986 and authorizes a levy of impact fees on new residential and commercial/industrial development. The bill was expanded and revised in 1987 through the passage of AB 1600, which added Sections 66000 et seq. to the California Government Code. Under this statute, payment of impact fees by developers serves as CEQA mitigation to satisfy the impact of development on school facilities.

California Senate Bill 50

Senate Bill (SB) 50, passed in 1998, provides a comprehensive school facilities financing and reform program, and enables a statewide bond issue to be placed on the ballot. Under the provisions of SB 50, school districts are authorized to collect fees to offset the costs associated with increasing school capacity as a result of development and related population increases. The funding goes to acquiring school sites, constructing new school facilities, and modernizing existing school facilities. SB 50 establishes a process for determining the amount of feeds developers would be charged to mitigate the impact of development on school districts from increased enrollment. According to Section 65996 of the California Government Code, development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation."

Under this legislation, there are three levels of developer fees that may be imposed upon new development by the governing school district.

- Level I fees are assessed based on the proposed square footage of residential, commercial/industrial, and/or parking structure uses.
- Level II fees require the developer to provide one-half of the costs of accommodating students in new schools while the State provides the remaining half. To qualify for Level II fees, the governing board of the school district must adopt a School Facilities Needs Analysis (SFNA) and meet other prerequisites in accordance with Section 65995.6 of the California Government Code.
- Level III fees apply if the State runs out of bond funds, allowing the governing school district to impose 100 percent of the cost of school facility or mitigation minus any local dedicated school monies on the developer.

The Pasadena Unified School District, which serves the City, collects Level I Fees, which are currently \$2.24 per residential square foot and \$0.36 per commercial/industrial square foot (Walker 2013).

Local

City of Sierra Madre Municipal Code

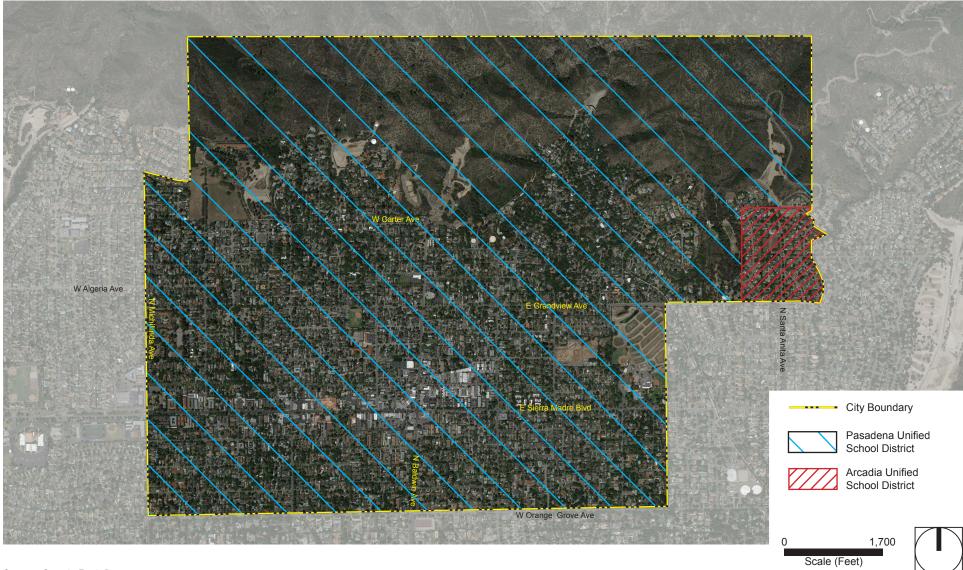
The following provision from the City's Municipal Code focuses on school impacts associated with new development projects and are relevant to the General Plan Update:

Title 16 (Subdivisions), Chapter 16.32 (Dedications, Improvements and Requirements), Section 16.32.070 (School Sites). Requires any developer who develops or completes the development of a subdivision in the City to dedicate land, pay fees in lieu of, or an appropriate pro rata share to the school district as necessary for the purpose of constructing or expanding new school facilities to assure residents of the subdivision have adequate public school services.

Existing Conditions

The majority of students in the City of Sierra Madre are served by the Pasadena Unified School District (PUSD), with a small area in the northeastern portion of the city being served by the Arcadia Unified School District (AUSD) (see Figure 5.10-1, *School District Boundaries*). PUSD schools for Sierra Madre student residents include Sierra Madre School, a combined public elementary/middle school housed on two campuses in the city. Pasadena High School, which also serves Sierra Madre residents for grades 9-12, is located in the City of Pasadena (Sierra Madre 2013b). The AUSD schools that serve the small area in the northeastern portion of Sierra Madre include Highland Oaks Elementary School, Foothills Middle School and Arcadia High School, all located in the City of Arcadia (AUSD 2015).

Figure 5.10-1 - School District Boundaries 5. Environmental Analysis



Source: Google Earth Pro, 2015

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PUSD provides educational services to students in kindergarten to 12th grade. PUSD oversees 17 K-5 elementary schools, 3 K-8 schools, 5 middle schools (6-8th grade), 4 high schools (9-12th grade), and 2 alternative schools. The majority of students living in the City of Sierra Madre are within the PUSD school boundaries of Sierra Madre School and Pasadena High School. Table 5.10-5 shows the current enrollment and capacity of the two schools.

School	Address	Current Enrollment	Current Capacity	Remaining Capacit
Sierra Madre School	Lower Campus (Grades K-5) 141 West Highland Avenue Sierra Madre, CA 91024	744	800	56
(Grades K-8)	<u>Upper Campus (Grades 6-8)</u> 160 North Canon Sierra Madre, CA 91024	410	410 (650 ¹)	0 (240)
Pasadena High School (Grades 9-12)	2925 East Sierra Madre Boulevard Pasadena, CA 91107	1,897	2,800	903
TOTAL	_	3,051	4,010 (4,250 ¹)	959 (1,199 ¹)
TOTAL Source: PUSD 2013; Salina Notes:	s and Newsom 2011; Newsom 2013; Toulor rrently under construction and will have a ca	umian 2013; Salinas 2013.		959 (1,1

Table 5.10-5City of Sierra Madre School Enrollments for 2012-2013

As stated above, Sierra Madre School is separated into two campuses, the lower campus is for Sierra Madre Elementary School (K-5) and the upper campus is for Sierra Madre Middle School (6-8). There are existing plans for the elementary campus to construct a new 4th and 6th grade wing to replace the existing bungalow and for the middle school campus, currently consisting of bungalows and portables, to build an entirely new campus of permanent building structures; completion of these campus improvements has commenced and is expected to be completed in mid-2015 and ready for operations by the 2015-2016 school year (Walker 2013).

Student Generation Rates

Student generation rates are used by school districts to estimate the number of students generated by new development in order to determine whether or not existing school facilities would be adequate for future students. Different school districts have varying rates depending on new single- or multifamily dwelling unit developments and also categorize rates based on grade levels. PUSD's student generation rates are 0.13, 0.07, and 0.09 for grades K-5, 6-8, and 9-12, respectively (Xocoy 2013).

Funding

Pursuant to Section 16.32.070 (School Sites) of the City's Municipal Code, developers who develop or complete the development of a subdivision in the City are required to dedicate land, pay fees in lieu of, or an appropriate pro rata share to PUSD or AUSD as necessary for construction or expansion of school facilities to maintain an adequate level of public school services to the City's residents. These school facilities impact fees are set by PUSD and AUSD, and are currently \$2.24 and \$3.20 per square foot for new residential

developments, respectively, and \$0.36 and \$0.51 per square foot for new commercial/industrial developments, respectively. In addition to new subdivisions, these school facilities impact fees are also applicable to property owners who build a new residence on a previously vacant lot, or add over 500 square feet of floor area to an existing residence.

In November 2008, PUSD voters passed the \$350 million Measure TT bond initiative to repair and upgrade PUSD's aging and deteriorating campuses. This would include improving plumbing, heating, ventilation, and fire alarm systems; replacing portable classrooms; enhancing disabled accessibility, implementing energy- and water-saving projects; and modernizing or reconstructing kindergartens, cafeterias, multipurpose facilities and gyms. More specifically, Sierra Madre Elementary School is expecting new classroom constructions, HVAC upgrades, and parking lot restorations; Sierra Madre Middle School is expecting a new school campus with twenty new classrooms, two science labs, two multipurpose rooms, a computer lab, library, gymnasium, café, and parking area; and Pasadena High School is expecting gymnasium renovations, restroom and security system upgrades, and fire alarm corrections (PUSD 2014).

5.10.3.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

SS-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for school services.

5.10.3.3 RELEVANT GENERAL PLAN POLICIES AND IMPLEMENTATION MEASURES

The following are relevant policies and measures of the General Plan Update and Implementation Program, respectively, which are designed to reduce potential impacts to school services and facilities as a result of implementation of the General Plan Update.

General Plan Update Policies

Land Use Element

- **Policy L41.4:** Retain all school sites that are needed to meet future educational needs and determine the appropriate use of surplus school property in the context of the City's open space and recreation needs.
- Policy L41.3: Allow the re-use of existing institutional properties as appropriate for the following uses:
 - Relocation of large institution.
 - Retreat center, civic use or other such uses operated by religious, non-profit or health organizations.
 - Housing for institutional uses such as dormitories.
 - Parkland, open space, and public recreation facilities.
 - School.

Implementation Program Measures

Land Use Implementation Program

- Measure IM-60: The City shall amend the Institutional (I) Zoning Ordinance as necessary to require compatibility with adjacent land uses, require approval of a master plan to allow the expansion of existing institutional sites, and allow re-use of existing properties subject to approval of a conditional use permit (CUP) for the following purposes: relocated large institutions, retreat centers, civic and religious uses, non-profit or health organizations, housing for institutional uses, parkland, open space, public recreation and schools.
- Measure IM-61: The City shall amend the I (Institutional) Zoning Ordinance to prohibit a change of use/zone change of school sites that would allow for uses other than educational uses unless a finding is made that such sites are not needed to meet future educational needs and that consideration has been given to the City's open space and recreation needs.

5.10.3.4 ENVIRONMENTAL IMPACTS

The following impact analysis addresses thresholds of significance for which the Notice of Preparation (see Appendix A) disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

For the impact analysis of all thresholds below, it should be noted that the large infill opportunity site shown in Figure 3-5, *Infill Opportunity Sites*, just north of Carter Avenue, which is associated with the residential subdivision known as Stonegate, is an approved development project and was analyzed under separate environmental documentation in accordance with CEQA. The impacts to school services and facilities resulting from Stonegate were addressed and mitigated for in that environmental documentation. Also, all residential lots within Stonegate are subject the provisions of the City's Municipal Code and the Hillside Management zone regulations (Chapter 17.52) of the City's Municipal Code, which requires that each residential development within Stonegate obtain approval of a hillside development permit.

For the purpose of the following analysis, it is also important to note that, based on the requirements of CEQA, this analysis is based on a comparison to existing land uses and does not address the differences that would result from a comparison with the existing General Plan land use map, from which there is little variation when compared to the proposed General Plan land use map.

Furthermore, it is also important to note that while the General Plan Update establishes City-wide policy level guidance, includes a revision to the current land use map (see Figures 3-4, *Current Land Use Map*, and 3-6, *Proposed Land Use Map*), and modifies the development potential of certain parcels in the City (see Figure 3-5, *Infill Opportunity Sites*), it does not contain specific development project proposals. The General Plan Update is a regulatory document that sets forth the framework for future growth and development (e.g., infill development, redevelopment, and revitalization/restoration) in the City and does not directly result in development in and of itself. Before any development can occur in the City, all such development is required to be analyzed for conformance with the City's General Plan, zoning requirements, and other applicable local

and state requirements; comply with the requirements of CEQA (e.g., preparation of site-specific environmental documentation in accordance with CEQA); and obtain all necessary approvals, clearances, and permits.

Impact 5.10-3: Future development in accordance with the General Plan Update would generate approximately 80 additional students, which would potentially impact the school enrollment capacities of the Pasadena Unified School District and Arcadia Unified School District. [Threshold SS-1]

Impact Analysis: The General Plan Update would allow for a total (buildout) of 5,244 residential dwelling units in the City. When compared to existing conditions (5,123 dwelling units), this is an increase of up to 121 dwelling units, which would in turn increase the City's population by 277 residents (see Table 3-5, *General Plan Update Summary of Changes in Land Use from Existing Conditions*). Table 5.10-6 shows the estimated increase in student population with buildout of the General Plan Update using PUSD's student generation rates.

Grade Level	Student Generation Rate	Estimated General Plan Update Buildout Students	Existing School Enrollment	Total School Enrollments with General Plan Update	Total School Capacity	Remaining Capacity
K–5	0.13	36	744	780	800	20
6–8	0.07	19	410	429	410 (650 ¹)	-19 (221 ¹)
9-12	0.09	25	1,897	1,922	2,800	878
TOTAL	—	80	3,051	3,131	4,010 (4,250 ¹)	879 (1,119 ¹)

Table 5.10-6	Projected Student Populations in PUSD Schools Serving Sierra Madre
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Source: PUSD 2013, Salinas and Newsom 2011; Newsom 2013; Touloumian 2013; Salinas 2013.

¹ The Sierra Madre School Upper Campus (Grades 6-8) is currently under construction and will have a capacity of 650 after completion in March 2015.

As shown in Table 5.10-6, the projected student enrollment with buildout of the General Plan Update would not increase over any existing PUSD school capacities, with the exception of the Sierra Madre School Upper Campus, which serves middle school studies and is currently at full capacity. However, construction has commenced at the middle school campus, which currently consists of bungalows and portables, to build an entirely new campus of permanent building structures. Construction of the middle school year (Walker 2013). After construction is completed, the school will have a capacity of 650 students, which would be able to serve well over the projected student population of sixth to eighth graders in the City. Therefore, PUSD would be able to adequately serve the student population in Sierra Madre with the implementation of the General Plan Update.

Additionally, future development in accordance with the General Plan Update would not impact the school enrollment capacities of AUSD. The small area of the northeastern portion of the city that is served by AUSD (see Figure 5.10-1, *School District Boundaries*) would not see an increase of development under the General Plan Update, as no parcels within this area were identified as infill opportunity sites (see Figure 3-5, *Infill Opportunity Sites*), which are the sites where potential growth could occur under the General Plan Update.

Notes:

Furthermore, the potential need for additional school facilities in the future is addressed through compliance with the school impact fee assessment. SB 50 (Chapter 407 of Statutes of 1998) sets forth a state school facilities construction program that includes restrictions on a local jurisdiction's ability to condition a project on mitigation of impacts on school facilities in excess of fees set forth in Education Code Section 17620. Section 16.32.070 (School Sites) of the City's Municipal Codes also addresses the requirement of school impact fees. These fees are collected by school districts at the time of issuance of building permits for commercial, industrial, and residential projects. Therefore, PUSD would be able to collect these school impact fees from future developments in accordance to the General Plan Update, pursuant to SB 50 and the City's Municipal Codes. The State Legislature has declared that the payment of those fees constitutes full mitigation for the impacts generated by new development, per Government Code Section 65995. Since all future development projects that would be accommodated under the General Plan Update must pay their appropriate school impact fees, each development project would mitigate the impacts associated with its activities.

Finally, the General Plan Update and Implementation Program include policies and measures that would help maintain adequate levels of services and reduce impacts of potential development projects on school services and facilities. Specific policies and measures provided in the General Plan Update and Implementation Program, respectively, include:

- Land Use Element Policy L41.4: Retain all school sites that are needed to meet future educational needs and determine the appropriate use of surplus school property in the context of the City's open space and recreation needs.
- Land Use Element Policy L41.3: Allow the re-use of existing institutional properties as appropriate for the following uses:
 - Relocation of large institution.
 - Retreat center, civic use or other such uses operated by religious, non-profit or health organizations.
 - Housing for institutional uses such as dormitories.
 - Parkland, open space, and public recreation facilities.
 - School.
- Land Use Implementation Program Measure IM-60: The City shall amend the Institutional (I) Zoning Ordinance as necessary to require compatibility with adjacent land uses, require approval of a master plan to allow the expansion of existing institutional sites, and allow re-use of existing properties subject to approval of a conditional use permit (CUP) for the following purposes: relocated large institutions, retreat centers, civic and religious uses, non-profit or health organizations, housing for institutional uses, parkland, open space, public recreation and schools.
- Land Use Implementation Program Measure IM-61: The City shall amend the I (Institutional) Zoning Ordinance to prohibit a change of use/zone change of school sites that would allow for uses other than educational uses unless a finding is made that such sites are not needed to meet future educational needs and that consideration has been given to the City's open space and recreation needs.

For these reasons, future development that would be accommodated by the General Plan Update, any land use changes proposed under the General Plan Update, and any new or updated policies of the General Plan Update are not anticipated to create a significant impact on school services and facilities.

5.10.3.5 EXISTING REGULATIONS

State

• California Senate Bill 50

Local

 City of Sierra Madre Municipal Code Title 16 (Subdivisions), Chapter 16.32 (Dedications, Improvements and Requirements), Section 16.32.070 (School Sites)

5.10.3.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon compliance with the regulatory requirements and implementation of the General Plan Update policies and Implementation Program measures, the following impacts would be less than significant: 5.10-3.

5.10.3.7 MITIGATION MEASURES

Impacts are less than significant and mitigation measures are not required.

5.10.3.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No mitigation measures are required. Therefore, no significant unavoidable adverse impacts relating to school services and facilities remain.

5.10.4 Library Services

5.10.4.1 ENVIRONMENTAL SETTING

Regulatory Background

Local laws, regulations, plans, or guidelines that are potentially applicable to the General Plan Update are summarized below.

Local

City of Sierra Madre Municipal Code

The following provision from the City's Municipal Code focuses on library services impacts associated with new development projects and is relevant to the General Plan Update:

• Title 15 (Buildings and Construction), Chapter 15.52 (Public Facilities Fee). Imposes a fee as a condition of issuance of any project permit to mitigate potential impacts of new developments on public facilities.

Existing Conditions

The Sierra Madre Public Library (SMPL), constructed in 1955, is the fourth oldest city library in Los Angeles County and the tenth oldest in Southern California. The library, located at 440 W. Sierra Madre Boulevard, consists of 8,762 square feet and houses a collection of approximately 71,250 catalogued items and a historical archives collection. The archives are jointly owned and managed by the Sierra Madre Historic Foundation and SMPL. Collections include approximately 55,110 books, 2,000 reference materials, 3,300 media resources (CDs and DVDs), 95 periodicals, and 8,850 electronic books. Seven public computers are available for public use as well as free WiFi throughout the library. SMPL offers a wide range of library services to adults, teens, and children and the services are expanded through participation in the Southern California Library Cooperative, which consists of a network of 45 area libraries (Sierra Madre 2013c).

SMPL services include collection material circulation; interlibrary loan; online reference resources; online databases; downloadable e-books and audiobooks; foreign language learning programs; local history collections, programs and book clubs; preschool story times; summer reading programs (for children, teens, and adults); parent-child workshop series; and children's collection, and study spaces.

Library Needs Assessment

There are no prescriptive standards set for public libraries by the American Library Association, Public Library Association, or the State of California. Instead, they advocate an outcomes-based assessment process based on the fact that each library serves a different community with different needs. For example, libraries in communities with many young families would need various young adult and children services compared to libraries serving a population with a high percentage of retirees. In order to allow for a potential expansion of the existing library building in the future, the property at 449 Mariposas Avenue was rezoned in 2013 to permit library facilities, and the Children's Room of the SMPL was completed in 2012 to improve the use of the existing space.

The Sierra Madre Public Library's Board of Trustees (Board) follows the City's strategic planning process to assess the needs of the library for new services and facilities. In 2012, a community-wide survey was conducted, which formed the basis for the most recent Strategic Plan completed and adopted by the Board in October 2013 for the years 2014-2017 (Sierra Madre 2013d).

Staffing

SMPL is staffed by 4 full-time and 4.6 part-time employees providing 47 weekly public service hours from Monday through Saturday (Sierra Madre 2014). Regular staff duties include training patrons how to find and evaluate information and use technology effectively. Librarians also support the collection and preservation of the city's historical images and documents.

SMPL also has a number of volunteers that provide support services (e.g., archiving, in-house circulation and processing) to the library. For the fiscal year 2013-2014, SMPL had 29 volunteers, up from the previous fiscal year of 2012-2013, which was at 16 (Sierra Madre 2014).

Funding

Funding for the city's library facilities are provided by various means, including the City's General Fund. Based on the City's Annual Budget Report for 2013-2015, proposed General Fund allocations for SMPL for the 2014-2015 fiscal year include \$834,024 for personnel and \$263,680 for nonpersonnel needs (Sierra Madre 2013a). Additionally, small remodels and additions projects are usually funded through a combination of donations and the City's General Funds. An additional source of funding for SMPL comes from grants, which vary year to year.

Another source of funding is through the collection of Public Facilities Fees, in accordance with Chapter 15.52 (Public Facilities Fee) of the City's Municipal Code. Pursuant to Chapter 15.52, all new development must pay a Public Facilities Fee to offset the proposed development's potential impact on public facilities demand³. Public facilities include services such as water, sewer, parks, police, fire, and library services. Fees are collected at the time of issuance of building permits, as outlined in Section 15.52.050 (Timing of Payment). However, per SMPL, due to the minimal development opportunities in the city, the Public Facilities Fee should not be considered a consistently dependable source of future funding.

5.10.4.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

LS-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for library services.

5.10.4.3 RELEVANT GENERAL PLAN POLICIES AND IMPLEMENTATION MEASURES

The following are relevant policies and measures of the General Plan Update and Implementation Program, respectively, which are designed to reduce potential impacts to library services and facilities as a result of implementation of the General Plan Update.

³ For purposes of assessing Public Facilities Fees, new development does not include that which replaces existing development, but applies only to additional residential units or non-residential square footage created by new development.

General Plan Update Policies

Community Services Element

- **Policy C13.1:** Review the library's telecommunication capabilities and upgrade the facility to accommodate current and future technologies for use by the public and City employees.
- Policy C13.2: Maintain an updated computerized library management system to store library records and inventory.
- Policy C13.3: Evaluate transitioning to new technology for materials security and circulation system, or other self-service systems.
- **Policy C13.4:** Review and update collection development policies and procedures.
- Policy C14.1: Provide drop-in hours for the public to seek help using new technology, i.e. email, text, instant messaging, electronic devices and eReaders, use of Social Media.
- Policy C14.2: Provide continuing education opportunities for Staff in using digital and reference resources.
- **Policy C15.1:** Continue to develop the partnership between the library, local schools, and the Sierra Madre Historical Preservation Society.
- Policy C15.2: Identify under-represented groups in the community and target special programs and volunteer opportunities to include them (e.g. young adult, young parents, seniors, etc.)
- **Policy C15.3:** Maintain and enhance cultural and educational programs.
- **Policy C15.4:** Continue to improve services to people with special needs, i.e. Titles To Go (homebound delivery service).
- Policy C16.1: Continue to collect, preserve and make accessible materials relevant to the history of Sierra Madre, California.
- Policy C16.2: Facilitate communication between the Sierra Madre Historical Preservation Society and Library Board of Trustees to ensure exhibition and protection of important local history materials.
- Policy C16.3: Assist in the administration and preservation planning for the Sierra Madre Oral History Project and Digital Storyboards.
- Policy C17.1: Encourage the professional and paraprofessional development of staff through webinars, courses and meetings, workshops, seminars, professional committee participation, and extension courses.

- **Policy C17.2:** Promote the use of Sommer Library Scholarship and Eph Konigsberg Scholarship funds to staff.
- **Policy C18.1:** Continue to survey the community to assist staff in developing collections.
- Policy C18.2: Update the existing circulation policy to anticipate future needs, address current impact of technology on library use and provide procedures that are beneficial for both library and public.
- **Policy C19.1:** Promote the library at community gatherings, events and functions.
- Policy C19.2: Develop a new strategy and funding for an addition/remodel, or new facility to address
 multiple community needs including space for library programs, local history materials, public use of
 technology and meeting and work areas.
- Policy C19.3: Implement the Sierra Madre Public Library Strategic Plan, and continue to evaluate and update it as necessary to establish facility and service priorities.
- **Policy C20.1:** Promote the Friends of the Sierra Madre Library's fund raising activities.
- **Policy C20.2:** Expand the use of community volunteers under the direction of staff; include programs for teens and adults.
- **Policy C21.1:** Apply to grants and foundations for funds.
- Policy C21.2: Solicit private donations.
- **Policy C21.3:** Actively pursue Federal, State and local funding opportunities.
- Policy C21.4: Continue working with the Friends of the Sierra Madre Library, Sierra Madre Community Foundation and Sierra Madre Historical Preservation Society other local community philanthropic organizations to secure future funding.

Implementation Program Measures

Library Services Implementation Program

Measure IM-1: The City shall review and evaluate emerging library technologies, identify funding, prioritize technological projects, and incorporate projects as goals into Library Strategic Plan to ensure implementation. The library shall train staff and community residents in the use of implemented technologies.

- Measure IM-2: The City shall promote library services to the community by continuing relationships with local organizations and clubs, visits to local schools, surveying community residents for service priorities, and providing educational and cultural programs for all ages.
- Measure IM-3: The City shall utilize allocated training funds and local scholarship funds to encourage professional and paraprofessional training.
- Measure IM-4: The City shall continue to evaluate all library collections so that they are accessible, browseable, and relevant to community residents through the use of updated collection policies, circulation policies, and general library operational procedures.
- Measure IM-5: The City shall continue the Memorandum of Understanding agreement with the Sierra Madre Historical Preservation Society (SMHPS), and assign a Library Board of Trustee Liaison to attend monthly SMHPS meetings to report on library and local history matters; library staff will present to SMHPS twice yearly on status of Local History/Archive collection.
- Measure IM-6: The City shall continue to seek supplemental funding opportunities to support library services through local philanthropic groups, grants, and donations.
- Measure IM-7: The City shall continue to provide meaningful volunteer opportunities for residents from teens through adults. Library staff shall engage and train volunteers in duties relating to processing of library materials, docent tours, digitization projects, public programs, marketing, and as library ambassadors to the community.

5.10.4.4 ENVIRONMENTAL IMPACTS

The following impact analysis addresses thresholds of significance for which the Notice of Preparation (see Appendix A) disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

For the impact analysis of all thresholds below, it should be noted that the large infill opportunity site shown in Figure 3-5, *Infill Opportunity Sites*, just north of Carter Avenue, which is associated with the residential subdivision known as Stonegate, is an approved development project and was analyzed under separate environmental documentation in accordance with CEQA. The impacts to library services and facilities resulting from Stonegate were addressed and mitigated for in that environmental documentation. Also, all residential lots within Stonegate are subject the provisions of the City's Municipal Code and the Hillside Management zone regulations (Chapter 17.52) of the City's Municipal Code, which requires that each residential development within Stonegate obtain approval of a hillside development permit.

For the purpose of the following analysis, it is also important to note that, based on the requirements of CEQA, this analysis is based on a comparison to existing land uses and does not address the differences that would result from a comparison with the existing General Plan land use map, from which there is little variation when compared to the proposed General Plan land use map.

Furthermore, it is also important to note that while the General Plan Update establishes city-wide policy level guidance, includes a revision to the current land use map (see Figures 3-4, *Current Land Use Map*, and 3-6, *Proposed Land Use Map*), and modifies the development potential of certain parcels in the city (see Figure 3-5, *Infill Opportunity Sites*), it does not contain specific development project proposals. The General Plan Update is a regulatory document that sets forth the framework for future growth and development (e.g., infill development, redevelopment, and revitalization/restoration) in the city and does not directly result in development in and of itself. Before any development can occur in the City, all such development is required to be analyzed for conformance with the City's General Plan, zoning requirements, and other applicable local and state requirements; comply with the requirements of CEQA (e.g., preparation of site-specific environmental documentation in accordance with CEQA); and obtain all necessary approvals, clearances, and permits.

Impact 5.10-4: Future development in accordance with the General Plan Update would generate an additional 277 residents, potentially increasing the service needs for the Sierra Madre Public Library. [Threshold LS-1]

Impact Analysis: Future development that would be accommodated under the General Plan Update would allow for an increase of up to 121 dwelling units, which would increase resident population in the City by 277 persons. Under the General Plan Update, the city's population would increase from 11,094 (existing) to 11,371 (see Table 3-5, *General Plan Update Summary of Changes in Land Use from Existing Conditions*). Buildout of the General Plan Update would result in a slight increase in demand for library services.

The City of Sierra Madre does not have a standard measurement of service based on a volumes per capita ratio. Instead, SMPL uses an outcomes-based assessment process based on the fact that each library serves a different community with different needs. Also, since many collection items are now available electronically, the sizes of libraries are not considered adequate measures of service. Instead, increased availability of electronic resources may become better indicators of services in the coming years. As also noted in SMPL's Annual Statistical Report Fiscal Year 2013-2014, the annual circulation of library materials (e.g., books, DVDs, music) was down from the previous fiscal year of 2012-2013 (from 86,829 to 79,673), primarily due to the decrease in DVD circulation that occurred in 2012 when the library began charging one dollar for DVD. However, monies generated in rental revenue form DVD circulation and other fines totaled \$28,000; all of which supports the library materials (Sierra Madre 2014).

Additionally, costs for library facilities are funded by the City's General Fund. Increased tax revenue generated from the additional development that would be accommodated under the General Plan Update would add to the City's General Fund, in which SMPL receives annual funding. Based on the City's Annual Budget Report for 2013-2015, proposed General Fund allocations for SMPL for the 2014-2015 fiscal year include \$834,024 for personnel and \$263,680 for nonpersonnel needs (Sierra Madre 2013a). In addition to the City's General Fund, small remodels and additions projects are also usually funded through a combination of capital campaigns and donations. An additional source of funding for SMPL comes from grants, which vary year to year.

Cost for library facilities are also funded by the City's Public Facilities Fee placed on all new residential development, pursuant to Chapter 15.52 (Public Facilities Fee) of the City's Municipal Code. During the City's development review process, applicants of future developments that would be accommodated under the General Plan Update would be required to comply with the requirements in effect at the time building permits are issued, including payment of the required Public Facilities Fee (fees for library facilities only apply to residential development), as outlined in Section 15.52.050 (Timing of Payment). As stated in Section 15.52.070 (Special Fund), the fees go into a special fund, entitled the "public facilities fee fund", which are to be expended only on the installation, acquisition, construction and improvement of eligible facilities.

Furthermore, the General Plan Update and Implementation Program include policies and measures that would help maintain adequate levels of services and reduce impacts of potential development projects on library services. Specific policies and measures provided in the General Plan Update and Implementation Program, respectively, include:

- **Community Services Element Policy C13.1:** Review the library's telecommunication capabilities and upgrade the facility to accommodate current and future technologies for use by the public and City employees.
- **Community Services Element Policy C13.2:** Maintain an updated computerized library management system to store library records and inventory.
- **Community Services Element Policy C14.1:** Provide drop-in hours for the public to seek help using new technology, i.e. email, text, instant messaging, electronic devices and eReaders, use of Social Media.
- **Community Services Element Policy C15.2:** Identify under-represented groups in the community and target special programs and volunteer opportunities to include them (e.g. young adult, young parents, seniors, etc.)
- **Community Services Element Policy C18.2:** Update the existing circulation policy to anticipate future needs, address current impact of technology on library use and provide procedures that are beneficial for both library and public.
- Community Services Element Policy C19.2: Develop a new strategy and funding for an addition/remodel, or new facility to address multiple community needs including space for library programs, local history materials, public use of technology and meeting and work areas.
- Library Services Implementation Measure IM-1: The City shall review and evaluate emerging library technologies, identify funding, prioritize technological projects, and incorporate projects as goals into Library Strategic Plan to ensure implementation. The library shall train staff and community residents in the use of implemented technologies.

- Library Services Implementation Measure IM-2: The City shall promote library services to the community by continuing relationships with local organizations and clubs, visits to local schools, surveying community residents for service priorities, and providing educational and cultural programs for all ages.
- Library Services Implementation Measure IM-4: The City shall continue to evaluate all library collections so that they are accessible, browseable, and relevant to community residents through the use of updated collection policies, circulation policies, and general library operational procedures.
- Library Services Implementation Measure IM-6: The City shall continue to seek supplemental funding opportunities to support library services through local philanthropic groups, grants, and donations.

For these reasons, future development that would be accommodated by the General Plan Update, any land use changes proposed under the General Plan Update, and any new or updated policies of the General Plan Update are not anticipated to create a significant impact on library services and facilities.

5.10.4.5 EXISTING REGULATIONS

City of Sierra Madre Municipal Code, Title 15 (Buildings and Construction), Chapter 15.52 (Public Facilities)

5.10.4.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon compliance with the regulatory requirements and implementation of the General Plan Update policies and Implementation Program measures, the following impacts would be less than significant: 5.10-4.

5.10.4.7 MITIGATION MEASURES

Impacts are less than significant and mitigation measures are not required.

5.10.4.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No mitigation measures are required. Therefore, no significant unavoidable adverse impacts relating to school services remain.

5.10.5 References

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