

5. Environmental Analysis

5.12 PUBLIC SERVICES

This section addresses public services including Fire Protection and Emergency Services, Police Protection, Schools, and Libraries. Impacts to parks are addressed in Section 5.13, *Recreation*. Public and private utilities and service systems, including water, wastewater, and solid waste services and systems; are addressed in Section 5.16, *Utilities and Service Systems*.

The information in this section is based in part on written responses to service questionnaires from Kevin Johnson, Acting Chief of the Los Angeles County Fire Department Forestry Division; and Captain Coronne Jacobs of the Los Angeles County Sheriff's Department; the responses are included in Appendix M, *Public Services Correspondence*, to this DEIR.

5.12.1 Fire Protection and Emergency Services

5.12.1.1 REGULATORY BACKGROUND

The California Fire Code (CFC) comprises Part 9 of Title 24 of the California Code of Regulations. The CFC is updated on a three-year cycle; the 2016 CFC took effect on January 1, 2017. Hospitals are classified as essential facilities in California Building Code (CBC; Title 24, California Code of Regulations, Part 2) Table 1604A. Essential facilities are defined in CBC Chapter 2 as "Buildings and other structures that are intended to remain operational in the event of extreme environmental loading from flood, wind, snow or earthquakes." The CBC is updated on the same cycle as the CFC.

The current CFC is adopted, with certain modifications, as Title 32 of the Los Angeles County Code of Ordinances; which is adopted in turn as City of Duarte Municipal Code Section 15.04.010.

5.12.1.2 ENVIRONMENTAL SETTING

Fire Stations, Equipment, and Staffing

The Los Angeles County Fire Department (LACFD) provides fire protection and emergency medical services to the cities of Duarte and Irwindale, including the City of Hope campus. The City of Hope campus is in the first-in service area of Fire Station 44 at 1105 Highland Avenue in the City of Duarte, about 1.2 miles to the northeast. The next two closest fire stations to the project site are Station 48 at 15546 Arrow Highway in the City of Irwindale, about 4.2 miles by road to the southeast; and Station 169 at 5112 Peck Road in the City of El Monte, approximately 4.0 miles by road to the southwest (Johnson 2016). Apparatus and daily staffing at the three stations are listed below in Table 5.12-1.

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Table 5.12-1 Fire Stations

Station Address Distance from Project Site	Apparatus	Daily Staffing
Station 44 (1105 Highland Avenue, Duarte) 1.2 miles from the City of Hope campus	2 fire engines, one patrol vehicle	7
Station 48 (15546 Arrow Highway, Irwindale) 4.2 miles from the City of Hope campus	1 fire engine	4
Station 169 (5112 Peck Road, El Monte) 4.0 miles from the City of Hope Campus	1 fire engine	3

Source: Johnson 2016

Response Times

The LACFD's response time goals in urban areas are five minutes or less for the first arriving unit for fire and emergency medical responses and eight minutes or less for the advanced life support (paramedic) unit.

During 2015, Station 44's jurisdiction had an average emergency response time of 4 minutes 49 seconds (Johnson 2016).

5.12.1.3 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.

5.12.1.4 ENVIRONMENTAL IMPACTS

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

Impact 5.12-1: Implementation of the Campus Plan would introduce new structures, workers, patients, and visitors into the LACFD service boundaries. The LACFD estimates that it can serve the Campus Plan buildout with existing firefighting resources in and near the project site. [Threshold FP-1]

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Impact Analysis:

Construction

Construction projects under the Campus Plan are not expected to increase demand for fire protection and emergency medical services, however, the construction of projects has the potential re-route access to the site and immediately surrounding area due to street closures, closed access points, etc. Due to the nature of the project as a medical facility, it is critically important that construction activities do not block emergency access to City of Hope or surrounding neighborhoods. To address fire and emergency access needs, the traffic and circulation components of the proposed Campus Plan would be designed and constructed in accordance with all applicable Los Angeles County Fire Department (LACFD) design standards for emergency access (e.g., minimum lane width and turning radius). The Campus Plan includes a number of standards to ensure adequate emergency access. Gate access standards outlined in the Campus Plan require a minimum gate access width of 15 feet or as required by the LACFD. In addition, there are several campus access points that allow access for fire and emergency vehicles (including three on Duarte Road and one on Buena Vista Street). During the development review process the City of Hope would be required to coordinate with LACFD to ensure adequate emergency vehicle access during all phases of construction. Therefore, construction activities would not interfere with response times or service ratios and impacts would be less than significant.

Operation

Campus Plan buildout would result in a net increase of approximately 1,038,500 gross square feet of development, resulting in an increase of approximately 1,841 employees. This increase in building square footage and employees onsite is expected to generate an increase in demands for fire protection. LACFD anticipates that it can serve the project with existing firefighting stations, apparatus, and staff, and that project development would not require the LACFD to build new or expanded fire stations or obtain additional apparatus and staff (Johnson 2016). Therefore, impacts would be less than significant.

Further, future development in accordance with the Campus Plan would be required to comply with all applicable fire code and ordinances for construction, access, water mains, fire flows, and fire hydrants. Specific fire and life safety requirements for the construction phase would be addressed at the building fire plan check review stage (Johnson 2016). For example, site plans would be submitted to the Los Angeles Fire Department in order to obtain a fire flow requirement based upon the tenant type, building size, and building type. Compliance with LACFD requirements would also ensure adequate provision of resources. Demolition and replacement of outdated facilities with new facilities equipped with modern fire and life safety systems would also reduce demands for fire protection.

5.12.1.5 CUMULATIVE IMPACTS

The area considered for cumulative impacts is LACFD Battalions 16 and 10, which span much of the north-central and west-central San Gabriel Valley, respectively; Battalion 16 also serves part of the San Gabriel Mountains. Battalion 16 includes the cities of Duarte, Baldwin Park, Irwindale, Azusa, and Covina; while Battalion 10 encompasses the cities of Rosemead, El Monte, South El Monte, and San Gabriel, and some adjoining unincorporated areas. Battalion 16 is housed in eight fire stations, and Battalion 10 in nine stations

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(LACFD 2012). Over the buildout period of the Campus Plan, other projects in the service areas of Battalions 10 and 16 would develop additional structures housing increased numbers of residents and workers, thus generating increased demands for fire protection and emergency medical services. Cumulative growth anticipated in the region would generate increased tax revenues to cities and Los Angeles County. Some of those revenues would be available to fund construction of new or expanded fire stations; purchase additional apparatus; and/or hire additional staff. Such additional revenue would offset some of the potentially adverse impacts of increased development. In addition, similar to the proposed project, each of the cumulative projects would be subject to Title 24 Building Code regulations and individually subject to Los Angeles Fire Department review and compliance with all applicable construction-related and operational fire safety requirements of the Los Angeles Fire Department and the Building and Fire Codes of the applicable city. In addition, in correspondence included with Appendix M, LACFD has indicated that it will be able to serve cumulative developments in addition to the proposed project. To that end, LACFD has not identified the need for additional facilities as a result of the Campus Plan and identified cumulative development. Therefore, cumulative impacts to fire services would be less than significant.

5.12.1.6 EXISTING REGULATIONS

This analysis assumes compliance with all applicable laws. The following codes, rules, and regulations pertain to fire protection and were described in detail in Sections 5.12.1.1 of this DEIR and are listed below.

State

- California Fire Code (Title 24, California Code of Regulations, Part 9)
- California Building Code (Title 24, California Code of Regulations, Part 2)

5.12.1.7 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Impact 5.12-1 would be less than significant.

5.12.1.8 MITIGATION MEASURES

No mitigation measures are required.

5.12.1.9 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant.

5.12.2 Police Protection

5.12.2.1 ENVIRONMENTAL SETTING

The Los Angeles County Sheriff's Department (LACSD) provides police protection to the City of Duarte including the project site. Service to the City of Duarte is based at the Duarte Satellite Station at 1042 Huntington Drive, which is a sub-station to LACSD Temple Station in Temple City. Twenty-three full-time deputies from the LACSD Temple Station are assigned to the Duarte Satellite Station. Staff based at the

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Duarte Satellite Station cover the cities of Duarte and Bradbury on three shifts and includes two Special Assignment deputies, one school resource deputy, and one sergeant. In addition, relief personnel are dispatched from the LACSD Temple Station in Temple City.

LACSD generally prescribes to a service ratio of one patrol deputy per thousand residents. The service ratios, based on 2010 US Census data, are approximately one deputy per 972 residents (Jacob 2016). Note that police staffing is determined based on numerous factors, and a simple officer-to-population ratio is not recommended for making police staffing decisions (IACP 2015; ICMA 2013).

The Irwindale Police Department (IPD) provides police protection to the City of Irwindale. IPD is located at 5050 N. Irwindale Avenue and staffs 47 personnel, 11 patrol units, 2 motorcycles and 10 other vehicles (Irwindale 2015). In 2015, there were 20,412 calls for service (Irwindale 2015).

In addition to local police protection services, City of Hope Security provides 24-hour security service on the project site to handle routine security matters.

Response Times

LACSD response time goals for the Duarte Satellite Station's service area are 10 minutes for emergency calls, 20 minutes for priority calls, and 60 minutes for routine calls. Current average response times are 2.7 minutes for emergency calls, 8.9 minutes for priority calls, and 40.8 minutes for routine calls (Jacob 2016). IPD response times are typically less than five minutes in the City (Irwindale 2016).

5.12.2.2 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.

5.12.2.3 ENVIRONMENTAL IMPACTS

Impact 5.12-2: Implementation of the Campus Plan would introduce new structures, workers, patients, and visitors into the service area of the LACSD and IPD, thereby increasing the demand on police protection facilities and personnel. [Threshold PP-1]

Impact Analysis: Implementation of the Campus Plan could increase demands for police protection on the City of Hope campus. As described above, buildout would result in a net increase of approximately 1,038,500 gross square feet of development, resulting in an increase of approximately 1,841 employees. Buildout of the Campus Plan would allow an average daily population of 9,393, which includes patients, employees, physicians, and residents. Since any new housing or residents would be associated with the hospital uses and

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the Specific Plan would not allow new development of market-rate, for-sale housing or rental housing that is not part of campus operations, the project would have no impact on service ratios (Jacob 2016). However, City of Hope generates periodic calls for law enforcement services. Calls for service are expected to increase commensurate with the increase in growth on the project site (Jacob 2016). With the continued support of 24-hour security on the City of Hope campus it is expected that LACSD would continue to provide adequate service ratios and response times to the project site.

The large majority of proposed development under the Campus Plan would be in the City of Duarte. The largest single structure proposed in the Campus Plan in the City of Irwindale would be a parking structure near the northeast corner of the campus (see Figure 3-5, *Illustrative Site Plan*). The remaining uses proposed within the Infrastructure and Utility District do not generate a significant number of employees or result in a significant increase in demands for police service. Thus, it is not anticipated that Campus Plan buildout would require the Irwindale Police Department to build a new or expanded police facility.

In addition to police services provided by Duarte and Irwindale, City of Hope has a security department that provides safety, security, crime prevention and emergency response services for City of Hope main campus, 24 hours a day, seven days a week. The armed patrol division works closely and cooperatively with local agencies on issues of mutual concern by sharing information as needed. City of Hope patrol division will investigate reports in a timely manner and conduct impartial investigations. Any crimes will be reported to LACSD or IPD. The department is a hybrid department composed of both in-house staff members and contracted officer from G4S Solutions. City of Hope officers include 31 staff members. They provide a safe and secure campus environment by performing security, parking enforcement, traffic control and responding to calls for service. City of Hope is required to maintain security service levels established at the time of Specific Plan adoption (Section 6.5 of the City of Hope Master Plan).

Buildout of the Campus Plan with the existing security in place would not result in a significant impact to police services. Impacts are less than significant.

5.12.2.4 CUMULATIVE IMPACTS

The area considered for cumulative impacts is the service area of the Irwindale Police Department and LACSD Temple Station, which includes the cities of Duarte, Bradbury, Rosemead, South El Monte, and Temple City; and unincorporated areas of Los Angeles County near those cities. Over the buildout period of the Campus Plan, other projects in the Irwindale Police Department and Temple Station's service areas would develop additional structures housing increased numbers of residents and workers, thus generating increased demands for police services.

Buildout of the Campus Plan in combination with continued growth and intensification of land uses in the Duarte Satellite Station and Irwindale service areas would contribute to a cumulative impact on their resources and operations. Such increased demands are expected to require additional deputies, civilian personnel, and equipment, including vehicles, weaponry, communications equipment, and office furniture. Additional staff and resources would eventually require expansion of the Duarte Satellite Station (Jacob 2016). Other projects would generate increased tax revenues to cities and Los Angeles County. Some of those revenues would be available to fund construction of new or expanded Sheriff's stations; purchase additional

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equipment; and/or hire additional staff. Nevertheless, City of Hope has a security department that provides safety, security, crime prevention and emergency response services for the City of Hope campus, 24 hours a day, seven days a week, thus reducing demands on local law enforcement. Under the Campus Plan, City of Hope would, at a minimum, maintain its security services at current levels throughout the buildout of the project. This would ensure that the increase in development and population at the campus would not itself require expansion of LACSD facilities. Further, similar to the Campus Plan, each of the cumulative projects would be subject to review from the applicable law enforcement agency and would be required to comply with all applicable safety requirements of the law enforcement agency and the applicable city in order to adequately address police protection service demands. As a result, cumulative impacts to law enforcement services would not be cumulatively considerable and would be less than significant.

5.12.2.5 EXISTING REGULATIONS

No regulations govern law enforcement facilities.

5.12.2.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Impact 5.12-2 would be less than significant.

5.12.2.7 MITIGATION MEASURES

Project Design Features (PDFs)

The following project design features (PDF) would contribute to reducing impacts related to police protection services associated with the proposed project:

- City of Hope is required to maintain security service levels to that provided at the time of Specific Plan adoption (Section 6.5 of the City of Hope Master Plan).

Mitigation Measures

No mitigation measures are required.

5.12.2.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant.

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5.12.3 Other Services

5.12.3.1 ENVIRONMENTAL SETTING

School Services

Regulatory Background

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 (California Government Code Sections 66000 et seq.) 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 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 (California Government Code Section 65996), 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 fees developers will be charged to mitigate impacts. 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, three levels of developer fees may be imposed upon new development by the governing school district. Level I fees are assessed based upon the proposed square footage of residential, commercial/industrial, and/or parking structure uses. Level II fees require the developer to provide one-half of the costs of accommodating students in new schools, and the state provides the remaining half. To qualify for Level II fees, the governing board of the school district must adopt a School Facilities Needs Analysis 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 on the developer, minus any local dedicated school monies.

Duarte Unified School District

The Duarte Unified School District (DUSD) spans 23 square miles including the City of Duarte, the City of Bradbury, part of the City of Irwindale, some unincorporated Los Angeles County area southwest of the City of Duarte; and unincorporated Los Angeles County area in the San Gabriel Mountains north of the cities of Duarte and Bradbury. The District had population of about 27,729 counted in the 2010 US Census (US Census Bureau 2016a). DUSD operates five elementary schools, one intermediate school, one high school, one continuation high school. Districtwide enrollment in the 2015-16 school year was 3,853 (CDE 2016a).

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A charter school for grades 7-12, California School of the Arts-San Gabriel Valley – a partnership between DUSD and the Orange County School of the Arts – is scheduled to open on DUSD’s current Northview Intermediate School campus in the 2017-18 school year (DUSD 2016).

Library Services

Library services are provided to the project site by the Los Angeles County Public Library at the Duarte Library at 1301 Buena Vista Street, about 0.4 mile north of the project site.

5.12.3.2 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:

PS-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.

5.12.3.3 ENVIRONMENTAL IMPACTS

Impact 5.12-3: The proposed project would not generate new residents that would impact school or library facilities or services. [Threshold PS-1]

Impact Analysis:

School Services

Buildout of the Campus Plan would allow an average daily population of 9,393, which includes patients, employees, physicians, and residents. Any new housing or residents would be associated with the hospital uses and the Specific Plan would not allow new development of market-rate, for-sale housing or rental housing that is not part of campus operations. Project impacts on school, library or other population driven public services could result in an indirect impact if employment generation due to project buildout attracted substantial numbers of new workers into the region, inducing substantial population growth. Implementation of the proposed Campus Plan would result in the creation of approximately 1,841 new long-term jobs (see Table 3-3). As described in Section 5.11, *Population and Housing*, of this DEIR, the proposed Campus Plan is not expected to induce substantial population growth. As stated, it is expected that the jobs would be filled by workers in the region. Since growth associated with the proposed project would be driven by an increase in employees, no new students would be generated and the project would not place additional demands on school facilities.

Pursuant to AB 2926 and SB 50, DUSD may charge City of Hope developer fees for projects developed under the Campus Plan based on student generation rates for commercial and industrial uses even if little or no population increase is assumed, and City of Hope would be required to pay such fees. Developer fees per

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SB 50 would reduce any indirect impact on school facilities that might be caused by Campus Plan buildout, and impacts would be less than significant.

Library Services

Impacts to library services would be less than significant for the same reasons explained in the analysis of impacts on school facilities above. Many of the jobs generated by the project are expected to be taken by people who live in the region. Furthermore, people who work at City of Hope live throughout the San Gabriel Valley and people generally tend to visit libraries closer to their homes rather than those near their workplace. Thus, no substantial impact to any one library or library service provider would occur. Impacts would be less than significant.

5.12.3.4 CUMULATIVE IMPACTS

No project level impacts to school or library services would occur, therefore, the project would not combine with other projected growth in the region to cause significant cumulative impacts. No significant cumulative impacts would occur.

5.12.3.5 EXISTING REGULATIONS

This analysis assumes compliance with all applicable laws. The following codes, rules, and regulations pertain to schools and were described in detail in Sections 5.12.3.1 of this DEIR and are listed below.

State

- California State Assembly Bill 2926: School Facilities Act of 1986
- California Government Code Section 65996: Senate Bill 50
- California Government Code Sections 66000 et seq.: School Facilities Act of 1986

5.12.3.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Impact 5.12-3 would be less than significant.

5.12.3.7 MITIGATION MEASURES

No mitigation measures are required.

5.12.3.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant.

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