

3.13 PUBLIC SERVICES AND RECREATION

This section describes the existing public services and facilities, including fire protection, law enforcement, public schools, and parks and recreation and potential effects attributable to the project. Impacts are evaluated in relation to the actions needed to provide the services that could potentially lead to adverse physical environmental effects.

3.13.1 ENVIRONMENTAL SETTING

Descriptions and analysis in this section are based on information provided by Sacramento County, the City of Elk Grove, the Cosumnes Community Service District (CCSD), the Sacramento County Sheriff's Department (SCSD), the City of Elk Grove's Police Department (EGPD), the California Highway Patrol (CHP), the Elk Grove Unified School District (EGUSD), and applicable regulations.

FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES

The CCSD Fire Department provides fire protection, prevention, life safety and emergency medical services to a 157-square-mile area encompassing the city of Elk Grove, the city of Galt, and areas of unincorporated southern Sacramento County.

The CCSD Fire Department currently provides fire protection, fire prevention, and emergency medical services to the SOIA Area. The Fire Department is headquartered at 10573 East Stockton Boulevard, Elk Grove. The CCSD operates eight fire stations: ~~servicing the cities of~~ six in Elk Grove and two in Galt, as well as areas of unincorporated Sacramento County and a fire training facility. The closest existing fire stations to the SOIA Area are Station 71 or Station 72, at 8760 Elk Grove Blvd. and 10035 Atkins Drive respectively (CCSD 2016e). Both are approximately 5 miles (or 7 minutes per Google maps) from the SOIA Area. In addition, two new fire stations are planned in the vicinity of the SOIA Area, one within the Sterling Meadows project immediately north of the SOIA Area (along Lotz Parkway near Kammerer Road), and one in the Laguna Ridge Specific Plan Area, northwest of the SOIA Area (on Poppy Ridge Road just east of Big Horn Road) that will be built as these projects develop and as the need arises (City of Elk Grove 2014a). These new fire stations ~~would~~ directly serve the SOI Area (Ramos pers. comm., 2016).

Service Response

The CCSD Fire Department responds to various emergencies, including fires, vehicle collisions, hazardous materials spills, and medical and public assistance calls. The department has over 165 sworn personnel in the Operations Division, which has units devoted to fire suppression, training, and emergency medical services. The department currently staffs eight Type 1 engine companies (designed to fight structure fires), one ladder truck company, ~~six~~ seven ambulances, and a command officer each day on a 24-hour basis. ~~Also in the Elk Grove area,~~ The Department also operates six ~~eight~~ grass Type III engines (for fighting wildland and grass fires) and other specialty apparatus are staffed using these personnel as seasons and emergency circumstances dictate their use. Specialty apparatus includes one heavy foam unit, a heavy rescue vehicle, a mass decontamination trailer, a mass casualty incident trailer, two flood boat response trailers (containing eight boats total) and a swift water rescue boat. The department provides ambulance transportation and pre-hospital care throughout its service area, including ~~for~~ the cities of Elk Grove and Galt. The department employs over ~~80~~ 100 paramedics and over ~~60~~ 47 emergency medical technicians (EMTs). The Department's ~~operates six~~ operates seven full-time ambulance companies are staffed and operate 24 hours a day.

Communications and Mutual Aid

Fire and emergency services in Sacramento County have developed a Joint Powers Authority (JPA) for a unified dispatch system. The Sacramento Fire EMS Communications Center dispatches all fire agencies in Sacramento County.

CCSD is the primary fire protection and emergency medical response service within the SOIA Area. Sacramento Metro Fire District (SMFD), the City of Sacramento Fire Department (SFD), and the CCSD share common jurisdictional boundaries and participate in a regional automatic/mutual aid agreement. The CCSD also has a mutual aid agreement with the surrounding volunteer fire districts in southern Sacramento County, including Wilton, Courtland, Walnut Grove, and Herald Fire districts. As a result of the existing automatic and mutual aid agreements, the closest unit available is dispatched to an incident and fire district boundaries are not an issue when an incident occurs (Ramos, pers comm., 2017). ~~to provide mutual aid in the form of supplemental fire prevention, fire investigation, emergency medical services, hazardous materials control, water rescue, technical rescue and/or other emergency support during a major fire, disaster or other emergency. The JPA is comprised of the Sacramento Fire Department, the Sacramento Metropolitan Fire District, CCSD, and the Folsom Fire Department. Parties endeavor to cooperatively provide an appropriate, consistent, and efficient full service emergency response without regard to jurisdictional boundaries (City of Sacramento 2013).~~

POLICE PROTECTION

Sacramento County Sheriff's Department

The SOIA Area is currently served by the SCSD, which provides specialized law enforcement services to the County and local police protection to both the incorporated and unincorporated areas. Specialized law enforcement includes providing court security services, operating a system of jails for pretrial and sentenced inmates, and operating a training complex. Local police protection includes response to calls, investigations, surveillance, and routine patrolling. As of 2015, the SCSD employed 1,293 sworn officers, including 289 patrol officers (City of Elk Grove 2015b). The closest station to the SOIA Area is located at 7000 65th Street in Sacramento, approximately 11 miles (or 12 minutes) away.

City of Elk Grove Police Department

The EGPD also provides certain law enforcement services to the SOIA Area through a mutual aid agreement and would be the ~~main~~primary provider if future annexation requests were approved. The EGPD provides comprehensive police services throughout the City, including emergency and routine call response, follow-up investigations of crime, traffic enforcement, specialized anti-gang initiatives, and other crime prevention activities. EGPD has a force of ~~432~~ 139 sworn officers and ~~80~~ 86 civilian employees. This is equivalent to a staffing ratio of 0.82 sworn officers per 1,000 residents (City of Elk Grove 2015). The Police Department operates out of one police station, located at 8400 Laguna Palms Way, part of the City Hall complex, approximately 5 miles away from the SOIA Area.

As part of this facility, the EGPD operates a Community Service Center to report non-urgent or ongoing crimes, to have crime reports taken, and to take fingerprints and process other, routine requests for information. The EGPD handles approximately 100,000 service calls per year with a goal of ~~handling~~responding to Priority One

calls (those involving a violent crime in-progress or other life-threatening emergency) within five minutes. During 2015, EGPD’s actual average Priority One response time was ~~5.5~~ 5.3 minutes.

California Highway Patrol

The CHP provides traffic regulation enforcement, emergency management, and vice assistance on State highways, all federal interstate highways, and other major roadways in unincorporated Sacramento County. The SOIA Area is located within the CHP Valley Division, which is comprised of 20 area offices, one commercial vehicle enforcement facility, and four communications centers (CHP 2016).

SCHOOLS

The EGUSD provides K–12 education to the City of Elk Grove and the SOIA Area. Located in southern Sacramento County, the district covers 320 square miles. EGUSD had a 2015–2016 school year enrollment of 62,000 students. EGUSD has 66 schools: 40 elementary schools, 9 middle schools, 9 comprehensive high schools, 3 continuation high schools, an independent study school, an adult school, a special education school, a virtual academy, and 1 charter school (EGUSD 2016a).

Based upon current EGUSD school attendance boundaries, the SOIA Area falls within the attendance areas of Franklin Elementary School, Elizabeth Pinkerton Middle School, and Cosumnes Oak High School (EGUSD 2016). Franklin Elementary School is currently over capacity and has been offloading students to nearby schools for several years. Additionally, any excess capacity currently existing at Elizabeth Pinkerton Middle School and Cosumnes Oaks High School will be used to house future students from the already approved Laguna Ridge Specific Plan, Sterling Meadows, and the Southeast Policy Area. Therefore, those schools will not be able to accommodate the students who would reside in the proposed Kammerer/Highway 99 SOI Area, should it be developed, as described in this EIR. As shown on the EGUSD school attendance boundaries maps, students within the SOIA Area would attend Franklin Elementary School, Elizabeth Pinkerton Middle School, and Cosumnes Oak High School (EGUSD 2016). However, EGUSD periodically changes its school boundaries if a new school is built or the population in a particular area changes significantly. Thus, these schools or others may serve residents at the SOIA Area. Table 3.13-1 identifies the 2015-2016 school year enrollments for these schools. All three schools are currently operating below design capacity.

School Name	Grade	Enrollment	Design Capacity	Estimated Remaining Capacity
Franklin Elementary School	Pre-K-6	789	Traditional Calendar Capacity: 802	13
			Multi-track Year Round Calendar Capacity: 1,062	260
Elizabeth Pinkerton Middle School	7-8	1,084	1,424	340
Cosumnes Oak High School	9-12	2,237	2,568	331

Note: Student enrollment in the district changes daily as more students enroll and others leave; therefore, Table 3.13-1 does not necessarily reflect exact current enrollment.

Source: EGUSD 2016

Franklin Elementary School is located at ~~9373~~ 4011 Hood-Franklin Road and serves pre-kindergarten through sixth grade students. ~~Elk Grove Elementary School was completed in 1995 and has 29 classrooms, a library, multipurpose room, cafeteria, playfields, and hard courts. Franklin Elementary school was constructed in 1955 and has 29 classrooms, multipurpose room, cafeteria, playfields and hard courts.~~

Elizabeth Pinkerton Middle School is located at 8365 Whitelock Parkway and serves middle school students in grades 7–8. Elizabeth Pinkerton Middle School was opened in 2008. School facilities include 48 classrooms, a library, multipurpose rooms, a gymnasium with locker rooms, playfields and hard courts.

~~Elk Grove~~Cosumnes Oaks High School is located at 8350 Lotz Parkway and serves high school students in grades 9–12. The ~~Elk Grove~~Cosumnes Oaks High School was opened in 2008. School facilities include 90 classrooms, multipurpose rooms, a library, a gymnasium with locker rooms, playfields, and hard courts.

EGUSD prepared the *Facilities Master Plan 2015–2025 Update* (Master Plan) to provide updated enrollment, school capacity, student generation rates, and to determine the approximate number of new students generated by new residential development between 2015 and 2025. The Master Plan anticipates that due to significant development (which did not include any future development within the SOIA Area) within its boundaries, enrollment at Franklin Elementary School, Elizabeth Pinkerton Middle School, and Cosumnes Oaks High School is projected to increase and exceed the schools’ traditional calendar capacity by 2025, which could be addressed by constructing new schools and/or adjusting attendance boundaries. Changing to a multi-track year-round calendar or other measures may also be necessary as shown above (EGUSD 2016b).

EGUSD Funding

Under California’s current funding model for new school construction, theoretically, 50 percent of the funding comes from the State and 50 percent from local sources. According to the EGUSD, the State participation is less than 50 percent for new schools (Williams, pers. comm., 2017). In order to construct new schools to mitigate growth from new residential development, EGUSD’s local share comes from developer school impact fees. Based on its facilities needs assessment, EGUSD demonstrated the need to levy Level II developer fees (described below in Section 3.13.2, “Regulatory Framework”) that are higher than the statutory fee. As of September 2016, Level II fees for residential development are \$5.01 per square foot and \$0.56 per square foot for commercial/industrial construction.

The State has not allocated funding for any new school construction projects since 2012 (Williams, pers. comm., 2017). Applications for over \$1.5 billion worth of projects have been submitted to the Office of Public School Construction that have not been funded, or in some cases, have not been processed (Williams, pers. comm., 2017).

~~The EGUSD is funded by 50 percent State and 50 percent local sources. EGUSD can receive local funding through developer impact fees, tax revenue from Mello Roos districts, and General Obligation bonds. Developer impact fees are the major source of funding for the district. Based on its facility needs assessment, EGUSD demonstrated the need to levy Level II developer fees (described below in Section 3.13.2, “Regulatory Framework”) that are higher than the statutory fee. As of September 2016, Level II fees for residential development are \$5.01 per square foot and \$0.56 per square foot for commercial/industrial construction. Developer fees may be used to finance new schools and equipment, and to reconstruct existing facilities to maintain adequate housing for all the EGUSD’s students. Additional school funding is also provided through the~~

EGUSD Mello-Roos Community Facilities District (CFD) No.1. CFD No. 1 authorized the issuance of bonds not to exceed \$275 million. The proceeds of the bonds are intended to be used for improvements to existing elementary, middle and high schools and to construct future elementary, middle and high schools and additions to existing schools. However, this funding source is not intended to address needs resulting from new development.

PARKS

Cosumnes Community Services District

The CCSD provides parks and recreation facilities for residents of the city of Elk Grove, as well as unincorporated portions of Sacramento County. CCSD serves an area of roughly 157 square miles, including the city limits of the City of Elk Grove, plus unincorporated areas of Sacramento County. CCSD serves an estimated population of 183,000, of which 163,000 is served by the Parks and Recreation Department. The CCSD Parks and Recreation Department manages ~~90-94~~ parks totaling an estimated ~~684~~ 705 acres, 256 acres of landscape corridors and medians, and 18 miles of trails, and provides for several community programs, including youth sports, adults sports, aquatic programs, and manages a 9-hole golf course (CCSD Parks and Recreation 2016a). The closest existing CCSD facility is the Emerald Lakes Golf Course, directly to the east of the SOIA Area. Elk Grove Regional Park is approximately one mile north of the SOIA Area. This and other parks with other amenities could be used by future residents of the SOIA Area.

CCSD updated their Parks and Recreation Master Plan in ~~2009-2016~~ to plan for future parks and recreational facilities over the next 10- to 15-year period and determined that a need currently exists for more park acreage. No parks and recreation services are provided for or planned within the SOIA Area, since there is no development and no planned development (~~CCSD 2009~~City of Elk Grove 2016a).The CCSD is working on a new Parks and Recreation Master Plan, which is scheduled to be completed in early 2018.

Cosumnes Community Services District & City of Elk Grove Memorandum of Understanding (MOU)

Parks and recreation facilities in new development areas specifically, Laguna Ridge Specific Plan (LRSP), South East Policy Area (SEPA), Silverado Village, and Sterling Meadows are developed and operated in accordance with the MOU between the CCSD and the City. The City is responsible for funding the development and operations of the park and recreation facilities. The CCSD will own these facilities and exclusively provide their programming. Seven new parks have been already completed within the LRSP. These parks, as well as future parks and recreation facilities within LRSP, Sterling Meadows, Silverado Village, and SEPA, which are all developments immediately north of the SOIA Area, could be used by future residents of the SOIA Area.

City of Elk Grove

The City of Elk Grove and CCSD have an agreement for joint development and operation of all future parks in the Laguna Ridge Specific Plan (LRSP) located about one mile northwest of the SOIA Area, as described above. In addition, the City will solely own and maintain the future Civic Center Community Park located in the LRSP planned for a grand opening in 2018 (City of Elk Grove 2004; City of Elk Grove 2016**bb**). These park facilities could be used by future residents of the SOIA Area.

3.13.2 REGULATORY FRAMEWORK

FEDERAL AND STATE PLANS, POLICIES, REGULATIONS, AND LAWS

No federal plans, policies, regulation, or laws pertaining to public services and recreation are applicable to the proposed project.

California Occupational Safety and Health Administration

In accordance with California Code of Regulations, Title 8 Sections 1270 “Fire Prevention” and 6773 “Fire Protection and Fire Equipment,” the California Occupational Safety and Health Administration (Cal OSHA) has established minimum standards for fire suppression and emergency medical services. The standards include but are not limited to guidelines on the handling of highly combustible materials; fire hose sizing requirements; restrictions on the use of compressed air; access roads; and the testing, maintenance, and use of all firefighting and emergency medical equipment.

California Fire Code

The California Fire Code, which is contained in Title 24, Part 9 of the California Code of Regulations, (CFC) contains regulations relating to construction, maintenance, and use of buildings. Topics addressed in the code include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings and the surrounding premises. The CFC contains specialized technical regulations related to fire and life safety and those have been incorporated in to the City Building Code.

California Health and Safety Code

State fire regulations are set forth in Sections 13000, et seq. of the California Health and Safety Code, which includes regulations for building standards (as set forth 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.

Per the California Health and Safety Code, the Fire Code Official is both authorized to perform life safety inspections, and responsible for the enforcement of and life safety regulations adopted by the California State Fire Marshal in the California Buildings Standards. The Fire Prevention Bureau performs plan reviews and provides comments and field inspection on all construction projects within the jurisdiction. The Fire Inspectors also inspect occupancies and hazardous operations as required by the California Health and Safety Code.

State of California Emergency Medical Services regulations are set forth in Division 2.5 of the Health and Safety Code (Sections 1797-1799), which is known as the Emergency Medical Service System and the Prehospital Emergency Medical Personnel Act. The regulations include system administration, certification, medical control, facilities, and other facets of emergency medical care.

Quimby Act

The Quimby Act (California Government Code Section 66477) was established by the California legislature in 1965 to preserve open space and parkland in the rapidly urbanizing areas of the state. The Quimby Act authorizes local governments to establish ordinances requiring developers of new subdivisions to dedicate land for parks, pay an in-lieu fee, or perform a combination of the two. The Quimby Act requires a city or county to adopt standards for recreational facilities in its general plan recreation element if it is to adopt a parkland dedication/fee ordinance. The City's standards for parkland dedication under the Quimby Act are provided in the discussion of local regulations below. Both the County and the City collect Quimby Act in-lieu fees. These fees contribute to a fund that would be used to acquire properties for parkland.

State School Funding

California Education Code Section 17620 authorizes school districts to levy a fee, charge, dedication, or other requirement against any development project for the construction or reconstruction of school facilities, provided that the district can show justification for levying of fees. California Government Code Section 65995 limits the fee to be collected to the statutory fee unless a school district conducts a School Facility Needs Assessment (California Government Code Section 65995.6) and meets certain conditions.

Senate Bill 50 (Chapter 407, Statutes of 1998) instituted a school facility program by which school districts can apply for state construction and modernization funds. This legislation imposed limitations on the power of cities and counties to require mitigation of school facilities impacts as a condition of approving new development. It also provided the authority for school districts to levy fees at three different levels:

- ▶ **Level I fees** are the current statutory fees allowed under Education Code Section 17620. As mentioned above, this code section authorizes school districts to levy a fee against residential and commercial construction to fund school construction or reconstruction. These fees are adjusted every two years in accordance with the statewide cost index for Class B construction as determined by the State Allocation Board.
- ▶ **Level II developer fees** are outlined in Government Code Section 65995.5. This code section allows a school district to impose a higher fee on residential construction if certain conditions are met. These conditions include having a substantial percentage of students on multitrack year-round scheduling, having an assumed debt equal to 15–30 percent of the district's bonding capacity (the percentage is based on revenue sources for repayment), having at least 20 percent of the district's teaching stations housed in relocatable classrooms, and having placed a local bond on the ballot in the past 4 years that received at least 50 percent plus one of the votes cast. A facility needs assessment must demonstrate that the need for new school facilities for unhoused pupils is attributable to projected enrollment growth from the construction of new residential units over the next five years. As of September 2016, EGUSD's Level II fees are \$5.01 per square foot for residential development and \$0.56 per square foot for commercial/industrial construction.
- ▶ **Level III developer fees** are outlined in Government Code Section 65995.7. This code section authorizes a school district that has been approved to collect Level II fees to collect a higher fee on residential construction if State funding becomes unavailable. This fee is equal to twice the amount of Level II fees. However, if a district eventually receives State funding, this excess fee may be reimbursed to the developers or subtracted from the amount of State funding.

REGIONAL AND LOCAL PLANS, POLICIES, REGULATIONS, AND ORDINANCES

City of Elk Grove General Plan

Approval by LAFCo of this SOIA does not authorize any change in land use or governance. However, the proposed project would adjust the City of Elk Grove's SOI and allow the City or affected landowners the opportunity to file an annexation request with LAFCo to annex lands within the SOIA Area.

The City of Elk Grove General Plan establishes goals and policies to guide both present and future development within the City's jurisdiction. Note that Elk Grove is currently updating their General Plan and that future development would need to comply with the most current version of the General Plan. The City of Elk Grove's current General Plan policies and actions relevant to public services are provided below.

Parks

- ▶ **Policy PTO-1:** The City of Elk Grove supports the development, maintenance, and enhancement of parks and trails serving a variety of needs at the neighborhood, area, and citywide level. The City may seek to accomplish the provision of parks and trails in cooperation with the Cosumnes Community Services District (CCSD).
 - **PTO-1-Action 1** As part of the review of development projects, ensure that public parks and trails are provided which meet the City's and CCSD's criteria and which implement the CCSD/City Parks Master Plan and City Bicycle, Pedestrian, and Trail Master Plan.
- ▶ **Policy PTO-3:** Funding for maintenance of parks and/or trails shall be assured to the City's satisfaction prior to the approval of any Final Subdivision Map which contains or contributes to the need for a public parks and facilities.
- ▶ **Policy PTO-4:** New residential developments may be required to, at a minimum, provide parks consistent with the Quimby Act (CA Govt. Code Section 66477), through land dedication, fees in lieu, or on-site improvements at a standard of five (5) acres of land for parks per 1,000 residents. Land dedication and/or payment of in-lieu fees shall be required consistent with state law. Land dedication and/or fees may be required pursuant to other policies in this Element with or without the use of the authority provided in the Quimby Act, or in combination with the Quimby Act and other legal authority.

Public Facilities and Finance

- ▶ **Policy PF-1:** Except when prohibited by state law, the City shall require that sufficient capacity in all public services and facilities will be available on time to maintain desired service levels and avoid capacity shortages, traffic congestion, or other negative effects on safety and quality of life.
- ▶ **Policy PF-7:** The City shall require that water flow and pressure be provided at sufficient levels to meet domestic, commercial, and firefighting needs.
- ▶ **Policy PF-16:** Specific Plans shall identify all existing and planned school sites and should include guidelines and conceptual examples for incorporating new schools into overall neighborhood design.

- ▶ **Policy PF-17:** While recognizing that school siting and development are not within the jurisdiction of the City to control, the City strongly encourages the School District to consider the following criteria:
 - Traffic impacts on nearby roadways are addressed and mitigated to meet City standards for level of service.
 - Schools should serve as a focal point of neighborhood activity and be interrelated with churches, parks, greenways and off-street paths whenever possible.
 - Almost all residences will be within walking distance of a school (one mile or less) and all residences are within two miles of a school whenever possible.
 - New schools are adjacent to neighborhood and community parks whenever possible and designed to promote joint use of appropriate facilities.
 - New schools should link with trails, bikeways, and pedestrian paths wherever possible.
- ▶ **Policy PF-18:** The City supports state legislative efforts to secure additional state funding for school construction and ensure maintenance of local district priorities for funds in the state school bond program.
- ▶ **Policy PF-19:** Public facilities should be phased in a logical manner which avoids “leapfrog” development and encourages the orderly development of roadways, water and sewer, and other public facilities. The City shall not provide public financing or assistance for projects that do not comply with the planned phasing of public facilities. Interim facilities may be used only if specifically approved by the City Council.
- ▶ **Policy PF-21:** New development shall fund its fair share portion of its impacts to all public facilities and infrastructure as provided for in state law.

Safety

- ▶ **Policy SA-1:** The City will seek to maintain acceptable levels of risk of injury, death, and property damage resulting from reasonably foreseeable safety hazards in Elk Grove.
- ▶ **Policy SA-29:** The City shall regularly monitor and review the level of police staffing provided in Elk Grove, and ensure that sufficient staffing and resources are available to serve local needs.
- ▶ **Policy SA-32:** Cooperate with the ~~Elk Grove~~Cosumnes Community Services District (~~EGCSD~~CCSD) Fire Department [~~Cosumnes Community Services District~~] to reduce fire hazards, assist in fire suppression, and emergency medical services and promote fire safety in Elk Grove.
 - **SA-32-Action 1** Review new development for adequate water supply and pressure, fire hydrants, and access to structures by firefighting equipment and personnel.
 - **SA-32-Action 2** Review projects for compliance with the Fire Code as part of the building permit process.

- **SA-32-Action 4** Require, where appropriate, on-site fire suppression systems for all new commercial and industrial development to reduce the dependence on fire department equipment and personnel.

City of Elk Grove Municipal Code Chapter 22.40 “Park and Recreation Dedication and Fees”

Elk Grove Municipal Code Chapter 22.40 “Park and Recreation Dedication and Fees” provides standards and formulas for the dedication of parkland and in-lieu fees. These policies help the City acquire new parkland. As previously stated, the General Plan sets forth the standard that 5 acres of property for each 1,000 persons residing within the city is to be devoted to local recreation and park purposes, or other ratio as provided through an adopted community plan, specific plan, or similar master or strategic plan. ~~Where a recreational or park facility has been designated in the 2030 General Plan or a specific plan, and is to be located wholly or in part within a proposed subdivision to serve the immediate and future needs of the subdivision’s residents, the sub-divider must dedicate land for a local recreation or park facility sufficient in size and topography to serve the residents.~~ The amount of land to be provided is determined based on the appropriate standards and formula contained in Chapter 22.40. Under the appropriate circumstances, the sub-divider must, in lieu of dedicating land, pay a fee determined based on the appropriate standards and formula contained in Chapter 22.40 ~~equal to the value of the land prescribed for dedication to be used for recreational and park facilities that will serve the residents of the area being subdivided.~~

City of Elk Grove Municipal Code Chapter 16.95 “Development Impact Fees”

The Elk Grove City Code imposes six citywide development impact fees. Fees are assessed on landowners who develop property to provide funds for facilities required to meet the needs of, and address impacts caused by, the additional persons residing in or employed on the property as a result of the development. The fees are:

1. Capital Facilities Fee, which funds the following facilities: Civic Center; Police Facilities; Corporation Yard; Library Facilities; and Transit
2. Affordable Housing Fee, which funds the construction, acquisition or financing of new or existing multi or single family affordable housing projects within the City for low or very low income residents.
3. Roadway Fee, which is a multi-zonal fee program that funds the center lanes and medians of major roadways, and funds major intersections, freeway interchanges, and bridges
4. Fire Fee, which is a multi-zonal fee program that funds fire capital facilities and equipment.
5. Measure A Transportation Mitigation Fee, which funds regional transportation facilities. The City collects this fee on behalf of the Sacramento Transportation Authority (STA).

Elk Grove Bicycle, Pedestrian, and Trails Master Plan

The Elk Grove Bicycle, Pedestrian, and Trails Master Plan (Master Plan) is intended to offer recreational opportunities and an alternative method for transportation for Elk Grove residents (City of Elk Grove 2014b). The City Council adopted the Master Plan in January 2007, but the plan is continually updated as goals are achieved, as new funding sources become available, and in order to ensure consistency with the Elk Grove General Plan. The Master Plan shows a planned multi-use trail running east-west along Kammerer Road and several planned parks north of Kammerer Road (City of Elk Grove 2014b)

Cosumnes Community Services District Parks Master Plan

The Cosumnes Community Services District Parks Master Plan was initially approved by the CCSD in 2008, and the City gave its approval in 2010. The subsequent Master Plan 2016 Update was approved by both the City and CCSD in 2016. The Park Master Plan takes a system-wide approach to address recreation needs in Elk Grove and provides infrastructure direction for all areas in the CCSD/City service area, which includes the SOIA Area. CCSD had coordinated efforts with the City to update the Master Plan and ensure the document's vision, standards, and strategies meet the needs of both agencies. The CCSD Parks and Recreation Department is undertaking a new Parks and Recreation Master Plan which is scheduled to be completed early 2018.

CCSD Service Standards

CCSD Fire Department has established a response time goal of arriving on scene within seven-minutes of the 911 call, 90 percent of the time. CCSD has been given an Insurance Services Office (ISO) rating of 2 in “watered” areas and 2Y in “unwatered” areas, such as the proposed SOIA Area. The ISO rating is the recognized classification for a fire department or district’s ability to defend against major fires. A rating of 10 generally indicates no protection; whereas an ISO rating of 1 indicates high firefighting capability. The proposed SOIA Area is considered “unwatered.” According to the ISO, newly developing urban areas should have a fire station opened within 1½ mile of all commercial development and 2½ miles from all residential development when “buildout” exceeds 20 percent of the planned area.

~~CCSD has established a response time goal of arriving on scene in six minutes or less 90 percent of the time in the urbanized portions of the City. The CCSD Fire Department has established a standard response time of 12 minutes or less 90 percent of the time in the rural areas (this includes the SOIA Area).~~

~~The Insurance Services Office (ISO) rating is the recognized classification for a fire department’s or district’s ability to defend against major fires. According to the ISO, newly developing urban areas should have a fire station opened within 1.5 miles of all commercial development and 2.5 miles of all residential development when “buildout” exceeds 20 percent of the planned area. A rating of 10 generally indicates no protection, whereas an ISO PPC rating of 1 indicates high firefighting capability. CCSD has been given an ISO rating of 3 in “watered” areas and 9 in “unwatered” areas. The proposed SOIA Area is currently considered “unwatered.”~~

EGPD Service Standards

The EGPD handles approximately 100,000 service calls per year with a goal of ~~handling~~responding to Priority One calls (those involving a violent crime in-progress or other life-threatening emergency) within five minutes. EGPD’s actual average Priority One response time was 5.5 minutes for the fiscal year 2014–2015 (City of Elk Grove 2015).

3.13.3 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

METHODOLOGY

There are no changes to land uses proposed as part of this SOIA application. However, in order to facilitate environmental analysis for this SOIA request, the applicant has developed a conceptual land use scenario. The applicant-proposed array of land uses has been derived from the recently approved 1,200-acre mixed-use Southeast Policy Area (SEPA) land use distribution adjacent to the north, in order to facilitate project analysis.

The applicant estimates that the SOIA Area could accommodate development that could provide 18,000 to 20,000 jobs in office, industrial, and commercial settings. The SOIA application identifies a jobs-to-housing ratio ranging from 3.6:1 to 5.0:1. Development could include a significant employment component near the Grant Line Road/SR 99 interchange and along the Kammerer Road (future Capital Southeast Connector) corridor. Additionally, for the purposes of analysis, the applicant has identified that the SOIA Area could accommodate the development of a broad array of housing types, with a total of 4,000 to 5,000 dwelling units. For the purposes of analysis, the applicant notes that future proposed development would involve supportive infrastructure, public lands, and retail development that is oriented to future employment areas.

Evaluation of potential public services and recreation impacts was based on a review of regional and local planning documents pertaining to the SOIA Area and surrounding area, including the Elk Grove General Plan (City of Elk Grove 2015a). Additional background information on current services, staffing, and equipment was obtained through consultation with appropriate agencies.

Impacts related to public services and facilities attributable to the proposed SOIA were identified by comparing existing service capacity and facilities against future demand associated with implementation of the EIR land use scenario and identifying reasonably foreseeable service and facilities expansion required to serve the SOIA Area if it is developed in the future. Where possible, a quantitative comparison was used to determine impacts of the project on future demands. Population projections used in this analysis were calculated based on the construction of 4,000 to 5,000 dwelling units multiplied by the California Department of Finance's (DOF's) 2015 estimate of 3.25 persons per dwelling unit (DOF 2015). Based on this estimate, the proposed project would generate a total of 13,000 to 16,250 persons, along with non-residential development, as outlined above.

THRESHOLDS OF SIGNIFICANCE

The thresholds for determining the significance of impacts for this analysis are based on the environmental checklist in Appendix G of the CEQA Guidelines, as amended. The proposed project would have a significant impact related to public services and recreation if it would:

- ▶ Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection, police protection, schools, or parks;
- ▶ Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- ▶ Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

IMPACT ANALYSIS

IMPACT 3.13-1 Increased demand for fire protection and emergency medical services. *Future development could increase demand for CCSD fire protection and emergency medical services. This could trigger the need for additional fire stations and facilities, the construction and operation of which could result in impacts on the physical environment. This impact is considered **significant**.*

CCSD will provide fire protection, fire prevention, life safety, and emergency medical services to the SOIA. The closest fire stations to the SOIA Area are Station 71 or Station 72, at 8760 Elk Grove Blvd. and 10035 Atkins Drive respectively (CCSD 2016e). Both are approximately 5 miles (or 7 minutes per Google maps) from the SOIA Area. In addition, ~~two~~three new fire stations are planned in the vicinity of the SOIA Area, one within the Sterling Meadows project immediately north of the SOIA Area (near Lotz Parkway and Kammerer Road), and one in the Laguna Ridge Specific Plan Area, northwest of the SOIA Area (off Poppy Ridge Road near Big Horn Boulevard), and one near the intersection of Bradshaw Road and Grant Line Road. These stations will be built as these projects develop and as the need arises (Elk Grove 2014a).

Although the project does not propose any development or land use change, future City approved development could occur as a result of the SOIA. If the SOIA is approved, there may be annexation proposed in the future. If annexation is approved and then development is proposed that requires discretionary review by the City of Elk Grove, this would require General Plan consistency findings. In addition to consistency with the City's General Plan, future project proponents would be required to incorporate California Fire Code, California Health and Safety Code, and OSHA requirements into the project design to address access and finished surfaces for firefighting equipment; fire hydrant placement and sufficiency of fire hydrants; and fire flow availability. These topics are addressed by the City's General Plan Policy PF-7, Action SA-32-Action 1, SA-32-Action 2, and SA-32-Action 4. Physical impacts associated with construction and operations of on-site public facilities are evaluated throughout this EIR. The placement of any new on-site fire protection facilities has been considered in the other sections of this Recirculated Draft EIR, such as Biological Resources, and resource sections in the Draft EIR, such as Air Quality, which specifically analyze the potential for project construction and implementation.

The CCSD Fire Department receives its funding through property taxes, fees for service, and grant funding. New development projects are required to pay fire protection development fees to fund additional facilities and equipment. These funds would help to pay for all costs associated with the development of a new fire station, if needed. A CFD has also been established to assist in the long-term mitigation of growth impacts. Annexation into the CFD or lump sum payment to offset growth impacts is required of property owners of new development through a balloting process. Fee programs are regularly evaluated and updated, consistent with Elk Grove General Plan Policy PF-21, to ensure that adequate service levels are maintained.

If the proposed SOIA is approved, the area may develop over time. It is currently not known if The CCSD's existing CCSD fire protection facilities and personnel would not be adequate to meet the demands of future development. Due to the substantial number of residents (an estimated 13,000 to 16,250 persons) that could theoretically be accommodated within the SOIA Area in the future, the CCSD Fire Department ~~could~~ will need to build one or more of the predesignated new fire stations and need to hire additional firefighters, prevention, and emergency medical personnel to accommodate the increased demand for services. It is possible that the The construction and operation of new off-site facilities and expansion of existing off-site facilities by CCSD could also be required in order to maintain service ratios. As the recognized primary service provider for fire protection,

prevention, and emergency medical and rescue services, the CCSD and the City will be encouraged to work together closely to identify fire station locations, equipment, and personnel needs to support any increased demands on the CCSD (Ramos, pers. comm., 2017). The development review process should minimize service impacts to joint responder agencies, such as SMFD and SFD (Ramos, pers. comm., 2017). Therefore-However, this impact is conservatively assumed for the purposes of this EIR to be **significant**.

Mitigation Measures

Mitigation Measure 3.13-1: Demonstrate Adequate Fire Protection Facilities are Available before the Annexation of Territory within the SOIA Area.

At the time of submittal of any application to annex territory within the SOIA Area, the City of Elk Grove shall demonstrate that CCSD fire protection and life safety facilities will meet the service demands of development identified for the annexation territory, or that fair-share funding will be provided for the construction of new or expansion of existing fire protection facilities, as needed, to accommodate the increase in demand resulting from development of the annexation territory. The City of Elk Grove shall demonstrate future development has incorporated adequate water supply and pressure, fire hydrants, and access to structures by firefighting equipment and personnel and where appropriate, identified on-site fire suppression systems for all new commercial and industrial development into design plans consistent with General Plan polices PF-7, PF-21, and SA-32 and Action SA-32-Action 1, SA-32-Action 2, and SA-32-Action 4. Any expansion of service shall not adversely impact current service levels.

Significance after Mitigation

Implementation of Mitigation Measure 3.13-1 would reduce significant impacts associated with increased for fire protection services because the City of Elk Grove would reduce the dependence on fire department equipment and personnel by reducing fire hazards, assisting in fire suppression, and promoting fire safety in Elk Grove. Mitigation presented in this EIR for other environmental topic area addresses potentially significant adverse environmental effects to the extent feasible. This mitigation could apply to the public facilities elements of potential future development, in addition to the private development components.

Construction of future off-site fire protection facilities and expansion of existing facilities is the responsibility of CCSD. Implementation of mitigation measures would be the responsibility of the CCSD. However, physical environmental impacts from construction or operation of new or expansion of existing facilities could remain significant after implementation of mitigation (i.e., significant and unavoidable), or no feasible mitigation may be available to fully reduce impacts to a less-than-significant level. Neither LAFCo nor the City of Elk Grove would have control over CCSD's future fire protection facilities planning or the approval, timing, or construction. There is no additional feasible mitigation. Therefore, the impact is **significant and unavoidable**.

IMPACT 3.13-2 *Increased demand for law enforcement services. Future development could increase demand for EGPD law enforcement services. This could trigger the need for additional police stations and facilities, the construction and operation of which could result in impacts on the physical environment. This impact is considered significant.*

After annexation, the EGPD will provide ~~fire protection and emergency medical~~ police services to the SOIA. The EGPD operates out of one police station, located at 8400 Laguna Palms Way, part of the City Hall complex,

approximately 5 miles (or 7 minutes) away from the SOIA Area. If there is development in the future in the SOIA Area, this could increase demand for law enforcement services. EGPD currently has a staffing ratio of 0.82 officers per 1,000 residents. With the addition of 13,000 to 16,250 persons identified in the EIR land use scenario, an estimated 11 to 14 (rounded up) officers could be needed.

The EGPD could need to hire additional officers and administrative staff or construct new on-site facilities to accommodate the increased demand for services. Physical impacts associated with construction and operations of on-site public facilities are evaluated throughout this EIR. The placement of any new on-site police protection facilities has been considered in the other sections of this Recirculated Draft EIR, such as Biological Resources, and resource sections in the Draft EIR, such as Air Quality, which specifically analyze the potential for project construction and implementation.

New staff, equipment, and facilities that would be necessary to provide additional law enforcement services would be funded by property taxes, development impact fees, and potentially other mechanisms. The EGPD collects development impact fees for police facilities. The purpose of the fees is to mitigate the impacts caused by development. The City planning department assesses a fee of \$480 per single family dwelling (for fewer than 3 units, including duplexes), \$317 per multi-family dwelling units, \$305 for single family age-restricted housing, \$220 for multi-family age restricted housing, \$0.09 per square foot of commercial uses, \$0.07 per square foot of car sales, \$0.05 per square foot of hotel uses, \$0.15 per square foot of office space, and \$0.03 per square foot of industrial uses (City of Elk Grove 2016^{ac}). The City reviews development impact fees yearly and adjusts as necessary to adequately fund police protection services (City of Elk Grove 2016^{ac}). Future development would be required to pay a fair share of costs associated with law enforcement services and facilities through payment of development impact fees, consistent with Elk Grove General Plan Policy PF-21. This would help to ensure sufficient police protection facilities if there is development in the future within the SOIA Area.

It is currently not known if the EGPD's existing ~~fire protection~~ police facilities would be adequate to meet the demands of future development. Due to the substantial number of residents (an estimated 13,000 to 16,250 persons) that could theoretically be accommodated within the SOIA Area in the future, the EGPD could need to construct new off-site facilities and expand existing off-site facilities to maintain service ratios. Therefore, this impact is conservatively assumed for the purposes of this EIR to be **significant**.

Mitigation Measures

Mitigation Measure 3.13-2: Prepare a Plan for Service that Demonstrates Adequate Police Protection Facilities are Available before the Annexation of Territory within the SOIA Area.

At the time of submittal of any application to annex territory within the SOIA Area, the City of Elk Grove shall demonstrate that EGPD police protection and public safety facilities will meet the service demands of development identified for the annexation territory, or that fair-share funding will be provided for the construction of new on-site or off-site police protection facilities or expansion of existing police protection facilities, as needed, to accommodate the increase in demand resulting from development of the annexation territory. Any expansion of service shall not adversely impact current service levels.

Significance after Mitigation

Mitigation Measure 3.13-2 would reduce significant impacts associated with increased for police protection services because the City of Elk Grove would demonstrate EGPD police protection facilities will meet the service

demands of development identified for the annexation territory, or that fair-share funding will be provided. This mitigation could apply to the public facilities elements of potential future development, in addition to the private development components. Mitigation presented in other environmental topic area this EIR addresses potentially significant adverse environmental effects to the extent feasible. LAFCo is charged with applying requirements for changes in the organization of service agencies, ensuring efficient provision of government services, and guiding development away from prime agricultural land and other open space unless that development is planned, orderly, and efficient.

Construction of future off-site police protection facilities and expansion of existing facilities is the responsibility of the EGPD. Implementation of mitigation measures would be the responsibility of the EGPD. However, physical environmental impacts from construction or operation of new or expansion of existing facilities could remain significant after implementation of mitigation (i.e., significant and unavoidable), or no feasible mitigation may be available to fully reduce impacts to a less-than-significant level. There is no additional feasible mitigation. Therefore, the impact is **significant and unavoidable**.

IMPACT 3.13-3 *Increased demand for schools. Future development could result in the generation of school-aged children that increases the demand for schools. Future project applicant/s would be required to pay all applicable State-mandated school impact fees to EGUSD and the California Legislature has declared that payment of the applicable school impact fee is deemed to be full and adequate mitigation under CEQA for impacts on school facilities (California Government Code Section 65996). This impact is considered less than significant.*

Any development within the SOIA Area could lead to a substantial number of school-aged children in the area. ~~The conceptual land use plan has estimated that future development could generate approximately 2,700 students. Using EGUSD's current student yield factors, the EGUSD has determined that the potential development of 1,790 multi-family homes and 3,200 single-family homes would generate 3,287 students.~~ The SOIA Area is currently in the Franklin Elementary School District and the Elizabeth Pinkerton Middle School/Cosumnes Oaks High School District but it should be noted that school attendance boundaries may change, so other schools may eventually provide school services. As described above, ~~Franklin Elementary School, Elizabeth Pinkerton Middle School, and Cosumnes Oaks High School could accept more students. Franklin Elementary School is currently over capacity and has been offloading students to nearby schools for several years. Additionally, any excess capacity currently existing at Elizabeth Pinkerton Middle School and Cosumnes Oaks High School will be used to house future students from the already approved Laguna Ridge Specific Plan, Sterling Meadows, and the Southeast Policy Area. Therefore, the EGUSD indicated that it is unlikely that those schools could accommodate the students who would reside in the SOIA Area (Williams, pers. comm., 2017). Due to the number of students that could be generated by the proposed project, it is possible that adding these students to any existing school could exceed a school's capacity.~~

~~The project does not propose development or land use change. The location, type, and intensity of future development in the SOIA are not known at this time. For the purpose of analysis, a land use scenario was developed that included school facilities within the SOIA Area. Although the project does not propose any development or land use change, future development could occur as a result of the SOIA. If the SOIA is approved, there may be annexation proposed in the future. If annexation is approved and development is proposed that requires discretionary review by the City of Elk Grove, this would require General Plan consistency findings. City General Plan Policy PF-16 requires developments to incorporate new schools in their overall designs, which~~

would likely help to ensure that adequate school facilities are provided for current and future residents. The City supports State legislative efforts to secure additional State funding for school construction and ensure maintenance of local district priorities for funds in the State school bond program (City General Plan Policy PF-18). In addition, City General Plan Policy PF-21 requires new development to fund its fair share portion of its impacts to all public facilities as provided for in State law.

EGUSD has indicated that approximately two new elementary schools, one new middle school, and one new high school would be required to serve students generate within the SOIA Area. CDE criteria and review by the State Architect would guide the final location and design of on-site schools to avoid adverse effects (e.g., greater than 1,500 feet from a railroad, greater than 1,500 feet from high-pressure water or gas pipelines, greater than 100 feet from high-voltage power lines, greater than 500 feet from a busy roadway, relatively flat topography, site configuration that allows line of sight for playground supervision, and greater than 0.25 mile from permitted sources of hazardous air emissions). City General Plan Policy PF-17 recognizes that school siting and development are not within the jurisdiction of the City to control. However, the City encourages the EGUSD to have new schools serve as a focal point of neighborhood activity; provide new schools within walking distance of all residences; locate new schools adjacent to neighborhood and community parks; and link new schools to trails, bikeways, and pedestrian paths. The actual size, capacity, and timing of new schools would be determined by EGUSD.

It is possible that future residential development within the SOIA Area would generate demand for school facilities that are not met within the SOIA Area or are not for some period of time within the SOIA Area as it builds out. However, depending on how school facilities are located and designed relative to possible future residential development within the SOIA Area, future students could potentially be bused or driven to off-site schools within the EGUSD boundaries resulting in indirect impacts related to transportation, such as air pollutant emissions, greenhouse gas emissions, and transportation noise. The timing and specifics necessary to fully evaluate construction of school projects are unknown and would be determined by the EGUSD.

The proposed project alone would not trigger the need for additional school facilities, and exceeding school capacity would not be considered a physical impact under CEQA. For the purpose of this analysis, a land use scenario was developed that included school facilities within the SOIA Area. Indirect pPhysical impacts associated with construction and operation of future public facilities within the SOIA Area are evaluated at a program-level in the other sections of this Recirculated Draft EIR and Draft EIR, since these facilities are considered to be part of potential future development consistent with the proposed project. ~~These resource sections, such as Air Quality, Biological Resources, and other sections, which provide analysis and mitigation of buildout of the SOIA Area, including public facilities.~~

As stated above, City General Plan policies require developments to incorporate new schools in their overall designs to ensure adequate school facilities are provided for current and future residents and require new development to fund its fair share portion of its impacts to all public facilities, as provided for in State law. Pursuant to SB 50, the project applicant would be required to pay all applicable State-mandated school impact fees to EGUSD. As of September 2016, EGUSD's fees were \$5.01 per square foot for residential construction and \$0.56 for commercial construction, although these fees may increase by the time development is proposed (City of Sacramento Community Development Department 2016). The City would determine the assessable square footage that would be subject to the fee at the time of development. The California Legislature has declared that payment of the applicable school impact fee is deemed to be full and adequate mitigation under CEQA for

impacts on school facilities (California Government Code Section 65996). This impact is considered **less than significant**.

Mitigation Measures

No mitigation measures are required.

IMPACT 3.13-4 Increased demand for park and recreation facilities. *Future development would increase demand for park and recreation facilities, the construction of which could result in impacts on the physical environment. This impact is considered less than significant.*

Currently, there are no trails within or adjacent to the SOIA Area. According to the Elk Grove Bicycle, Pedestrian, and Trails Master Plan map, the City has planned for a multipurpose trail along Kammerer Road north of the SOIA Area (City of Elk Grove 2014b).

City and CCSD parkland standards require a minimum of 5 acres of developed parkland per 1,000 residents. Currently, CCSD serves an estimated population of ~~483,163,000~~, and manages 684,750.7 acres of developed parks and 18 miles of trails, 3.7 acres per 1,000 residents. In addition, the City and CCSD own 124.4 acres of parkland located within the City limits that is in the process being developed. Future development within the SOIA Area could add an estimated 4,000 to 5,000 housing units, or 13,000 to 16,250 residents to the CCSD service area.¹ This would require the development of an estimated 65 to 81.25 acres of parkland, using standards maintained by the City and CCSD. Whether or not this would occur depends on the amount of residential development within the SOIA Area and recreational interests of this population vis-à-vis the parks and recreational facilities that are developed within the SOIA Area in the future and existing and future parks and recreational facilities within and outside Elk Grove that are accessible to SOIA Area residents.

If there is development within the SOIA Area in the future, this development is assumed to be under the jurisdiction of the City of Elk Grove, and therefore subject to Elk Grove Municipal Code and General Plan policies requiring the dedication of park and recreation facilities and/or the payment of an in-lieu fee. Any new residential development would be required to pay applicable impact fees, including the General Government Fee that funds park facilities and development fees or other fair share funding mechanisms required by the City. These impact fees could fund the development of a new park or the maintenance of existing parks. In addition, the City would ensure that individual development proposals within the SOIA Area would provide trail segments consistent with the Elk Grove Trails Master Plan as part of the development review process of any future development.

The land use scenario used for analysis in this EIR assumes parkland within the SOIA Area. Physical impacts associated with construction and operation of future public facilities within the SOIA Area are evaluated in the other sections of this Recirculated Draft EIR, such as Biological Resources, and resource sections in the Draft EIR, such as Air Quality, other sections, which provide analysis and mitigation of buildout of the SOIA Area, including public facilities. The land use scenario assumes that development of the SOIA Area includes facilities associated with typical development projects, which includes parks. This is consistent with requirements of the

¹ According to the California Department of Finance (2015), the City of Elk Grove, for the most recent year of data (2015), estimated the persons per household rate at 3.25. Approximately 4,000 to 5,000 units multiplied by 3.25 is approximately 13,000 to 16,250 new residents within the SOIA area.

City's Municipal Code, General Plan, and existing development pattern. Consequently, the construction of parks within the SOIA Area is assumed in each of the technical sections of this EIR, and there are no known additional potentially significant impacts related to the provision of parks and recreational facilities or deterioration of existing facilities. This impact is considered **less than significant**.

Mitigation Measures

No mitigation measures are required.

This page intentionally left blank.