

3.13 PUBLIC SERVICES AND RECREATION

Comments received on the Notice of Preparation (NOP) were reviewed during preparation of this SEIR. A comment letter was received from the Sacramento Local Agency Formation Commission (LAFCo) regarding the provision and adequacy of public services. The City reviewed and considered this information during preparation of this section.

3.13.1 ENVIRONMENTAL SETTING

As reported in the 2019 SOIA EIR, the public services would be provided to the Project site by Sacramento County, the City of Elk Grove, the Cosumnes Community Service District (CCSD), the Sacramento County Sheriff's Department, the City of Elk Grove's Police Department, the California Highway Patrol (CHP), and the Elk Grove Unified School District (EGUSD).

The following environmental setting presents a brief summary of public services and recreation information contained in the 2019 SOIA EIR and provides current (2020) conditions that have changed since the 2019 SOIA EIR was prepared.

FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES

The CCSD Fire Department currently provides fire protection, fire prevention, and emergency medical services to the Project site. Fire stations that would serve the Project site include Station 71 at 8760 Elk Grove Boulevard, approximately 2.25 miles northwest of the Project site, and Station 73 at 9607 Bond Road, approximately 2 miles north of the Project site. Three new fire stations are planned in the vicinity of the Project site, one in the Laguna Ridge Specific Plan Area (Station 77), west of the Project site (on Poppy Ridge Road just east of Big Horn Road); one within the Sterling Meadows project (Station 78) west of the Project site (along Lotz Parkway near Kammerer Road); and one near the intersection of Bradshaw Road and Grant Line Road (Station 79) that will be built as the need arises (City of Elk Grove 2018).

POLICE PROTECTION

Sacramento County Sheriff's Department

The Project site is currently served by the Sacramento County Sheriff's Department, which provides specialized law enforcement services to the County and local police protection to both the incorporated and unincorporated areas. The closest station to the Project site is located at 7000 65th Street in Sacramento, approximately 9 miles northwest of the Project site. The Sacramento County Sheriff's Department would continue to provide law enforcement services to unincorporated portions of the Project site until annexation into the City occurs.

City of Elk Grove Police Department

The Elk Grove Police Department also provides certain law enforcement services to the Project site through a mutual aid agreement and would be the primary provider, following annexation. The Police Department has a force of 146 sworn officers and 108 civilian employees (Elk Grove Police Department 2019). This is equivalent to a staffing ratio of 0.80 sworn officers per 1,000 residents (City of Elk Grove Police Department 2019, California Department of Finance 2020). The Police Department operates out of one police station, located at 8400 Laguna

Palms Way, part of the City Hall complex, approximately 3.25 miles northwest of the Project site. During 2019, Police Department’s actual average Priority One response time was 4.9 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 Project site is located within the CHP Valley Division, which is comprised of 20 area offices, one commercial vehicle enforcement facility, and four communications centers.

SCHOOLS

As noted in the 2019 SOIA EIR, the EGUSD provides K–12 education to the City of Elk Grove and the Project site. As shown on the maps of EGUSD school attendance boundaries, the Project site is served by Elk Grove Elementary School, Joseph Kerr Middle School, and Elk Grove High School (EGUSD 2020). Table 3.13-1 identifies the 2019-2020 school-year enrollments for these schools. All three schools are currently operating below design capacity.

School Name	Grade	Enrollment	Design Capacity	Estimated Remaining Capacity
Elk Grove Elementary School	K–6	820	880	60
Joseph Kerr Middle School	7–8	907	1,519	612
Elk Grove High School	9–12	1,849	2,659	810

Source: California Department of Education 2020, EGUSD 2016

EGUSD Funding

In order to construct new schools to mitigate growth from new residential, commercial, and industrial 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 that are higher than the statutory fee. As of June 2020, EGUSD’s fees were \$6.34 per square foot for residential construction and \$0.66 for commercial construction (City of Sacramento Community Development Department 2020).

PARKS

Cosumnes Community Services District

The CCSD Parks and Recreation Department provides parks and recreation facilities for residents of an area of roughly 157 square miles, including the City limits of Elk Grove, plus unincorporated areas of Sacramento County. The CCSD Parks and Recreation Master Plan estimates that CCSD provides 5.26 acres of parkland per 1,000 residents in 2017, which exceeds the City and CCSD parkland standards of a minimum of 5 acres of developed parkland per 1,000 residents (CCSD Parks and Recreation 2018). The CCSD anticipates 36 new parks will be developed over the 10-year planning period of the Master Plan, and that CCSD will continue to meet or exceed the 5 acres per 1,000 residents parkland standard as development occurs and parkland is dedicated (CCSD Parks and Recreation 2018).

The closest CCSD park facilities are Berens Park, approximately 500 feet northwest of the Project site, and the Emerald Lakes Golf Course, directly to the east of the Project site. Elk Grove Regional Park is approximately 2 miles north of the Project site. No parks and recreation services are currently provided for or planned within the Project site (CCSD 2018).

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, the Southeast Policy Area, and future master planned areas of the City. In addition, the City solely owns and maintains the 56-acre Civic Center Community Park located south of Elk Grove Boulevard and east of Big Horn Boulevard. Referred to as District56, the site includes an Aquatics Center, Community Center, and (currently under construction) a Preserve that will include a network of trails, benches, picnic tables, wetland area overlooks, open meadow, outdoor exercise equipment, and play equipment(City of Elk Grove 2020a). District56 is also planned to include a library and performing arts center.

3.13.2 REGULATORY FRAMEWORK

City of Elk Grove General Plan

The City's General Plan (City of Elk Grove 2019) contains the following policies related to public services and recreation that are applicable to the proposed Project.

Urban and Rural Development

Service Levels

- ▶ **Policy LU-3-33:** Ensure infrastructure and facilities are planned and designed to meet projected future demands.

Community and Resource Protection

Park Facilities

- ▶ **Policy PT-1-3:** Require the provision of park land at a minimum of 5 acres per 1,000 residents, consistent with the Quimby Act.
- ▶ **Policy PT-1-5:** Funding for maintenance of parks and/or trails shall be assured to the City's satisfaction prior to approval of any Final Subdivision Map which contains or contributes to the need for public parks and facilities.

Services, Health, and Safety

Disaster and Emergency Risk Reduction

- ▶ **Policy ER-4-1:** Cooperate with the Cosumnes Community Services District (CCSD) Fire Department to reduce fire hazards, assist in fire suppression, and promote fire safety in Elk Grove.
 - **Standard ER-4-1.a:** 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.

Disaster and Emergency Response and Public Safety

- ▶ **Policy SAF-1-1:** 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 SAF-1-2:** Encourage the use of Crime Prevention Through Environmental Design (CPTED) principles in the design of projects and buildings, as well as parks and trails.

Urban Infrastructure

- ▶ **Policy INF-1-2:** Require that water flow and pressure be provided at sufficient levels to meet domestic, commercial, industrial, and firefighting needs.

Community Infrastructure and Facilities

- ▶ **Policy CIF 4-1:** While recognizing that public 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 school siting criteria:
 - Traffic impacts on nearby roadways should be addressed and mitigated to meet City standards for roadway performance targets.
 - Schools should not be located on main roadway corridors characterized by high speeds (>35 miles/hr).
 - Schools should serve as a focal point of neighborhood activity and be interrelated with congregation facilities, parks, greenways and off-street paths whenever possible.
 - Almost all residences should be within walking distance of a school (1 mile or less) and all residences should be located within 2 miles of a school whenever possible.
 - New schools should be located 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 CIF-4-3:** Support 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.

Infrastructure Financing and Phasing

- ▶ **Policy IFP-1-6:** Fee programs and/or other finance mechanisms shall be reviewed regularly to ensure that sufficient funding will be available to construct all required facilities.
- ▶ **Policy IFP-1-7:** New development shall fund its fair share portion of impacts to all public facilities and infrastructure as provided for in State law.

- ▶ **Policy IFP-1-10:** Except when prohibited by state law, the City will endeavor to ensure 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.

3.13.3 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

THRESHOLDS OF SIGNIFICANCE

Based on Appendix G of the CEQA Guidelines, 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.

CCSD will provide fire protection, fire prevention, life safety, and emergency medical services to the Project site. Future development of the Project site includes the potential for construction of approximately 5.6 million square feet of light and heavy industrial uses and 252,650 square feet of regional commercial uses. In addition, future development of mixed uses on the Project site could add an assumed 713 dwelling units with 2,304 residents (or employment uses that would require similar levels of infrastructure and services as 713 dwelling units). Project applicants for future projects would be required to incorporate California Fire Code, California Health and Safety Code, and federal Occupational Health and Safety Administration (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. Furthermore, City General Plan Policy ER-4-1 requires cooperation with the CCSD Fire Department to reduce fire hazards and City General Plan Standard ER-4-1.a requires installation of on-site fire suppression systems for all new commercial and industrial development. CCSD requires project applicants to submit project plans for review and approval to ensure California Fire Code and City standards are incorporated into project designs prior to the issuance of building permits

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 Community Facilities District has also been established to assist in the long-term mitigation of growth impacts. Annexation into the Community Facilities District or lump sum payment to offset growth impacts is required of property owners of new development through a balloting process. Fee programs and finance

mechanisms are regularly evaluated and updated, consistent with Elk Grove General Plan Policy IFP-1-6, to ensure that adequate service levels are maintained.

Future development of commercial, industrial, and mixed uses is assumed to occur over an approximately 20-year period. The CCSD Fire Department may need to build one or more of the three pre-designated new fire stations (i.e., Station 77, Station 78, or Station 79) and need to hire additional firefighters, prevention, and emergency medical personnel to accommodate the increased demand for services from development of the Project site and planned development in the Laguna Ridge Specific Plan Area, Sterling Meadows, and the Southeast Policy Area. The construction and operation of new off-site facilities and expansion of existing off-site facilities by CCSD could also be required 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. CCSD would conduct project-level CEQA or NEPA analysis, if necessary, to analyze specific impacts and identify any required mitigation measures for construction and operation of new fire stations to serve the project site. It is speculative to attempt to predict at this time the extent to which this would create any indirect impact that is distinct from the analysis of direct Project impacts.

Incorporation of California Fire Code, California Health and Safety Code, and OSHA requirements, as well as compliance with the City's General Plan policies, 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. As with the 2019 SOIA EIR, this impact is considered **less than significant**.

Impact 3.13-2: Increased Demand for Law Enforcement Services.

After annexation of the Project site, the Elk Grove Police Department will provide law enforcement services to proposed land uses. Future development could include construction of approximately 5.6 million square feet of light and heavy industrial uses and 252,650 square feet of regional commercial uses, as well as mixed uses that could potentially include residential development. City General Plan Policy SAF-1-2 encourages the use of CPTED principles in new development to reduce the potential for crime and ensure safety measures are incorporated into project designs.¹

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 purpose of the fees is to mitigate the impacts caused by development. As of January 2020, the City assesses a fee of \$1,162 per single-family dwelling (for fewer than 3 units, including duplexes); \$848 per multi-family dwelling unit, single-family, age-restricted housing, and multi-family age restricted housing; \$0.09 per square foot of shopping center and commercial uses; and \$0.20 per square foot of industrial uses (City of Elk Grove 2020b). This would help to ensure sufficient police protection facilities if there is development in the future within the Project site.

Future development would not affect the Police Department response times or other performance objectives because project applicants for future projects would pay development impact fees to ensure police protection personnel and equipment is provided to meet increased demand for police protection services. The Police

¹ CPTED principles consist of 1) natural surveillance by placing "eyes on the street"; 2) natural access and control through the use of doors, fences, shrubs, and other physical elements to prevent unauthorized persons access; 3) territorial enforcement by defining clear boundaries between public and private areas; and 4) maintenance and management.

Department currently has a staffing ratio of 0.80 officers per 1,000 residents (City of Elk Grove Police Department 2019, California Department of Finance 2020). The area of the Project site identified for development of mixed uses could generate up to 2,304 persons, resulting in the need for an estimated two (rounded up) officers. The addition of two new officers would not result in the need for additional police protection facilities. Therefore, as with the 2019 SOIA EIR, there would be no significant adverse physical environmental effect associated with construction and operation of new facilities and this impact is considered **less than significant**.

Impact 3.13-3: Increased Demand for Schools.

As with the 2019 SOIA EIR, the area of the Project site identified for development of mixed uses could generate school-aged children. Using EGUSD's 2020 student generation rates for residential development, the potential development of 713 dwelling units would generate approximately 183 new elementary school students (grades K–6), 51 middle school students (grades 7–8), and 57 high school students (grades 9–12).² Based on EGUSD's 2020 student generation rates for industrial and commercial development, the potential development of approximately 5.6 million square feet of light and heavy industrial development and approximately 253,000 square feet of regional commercial development could generate approximately 574 new elementary school, middle school, and high school students (grades K-12).³

The Project site is currently in the Elk Grove Elementary School, Joseph Kerr Middle School, and Elk Grove High School district boundaries but it should be noted that school attendance boundaries may change, so other schools may eventually provide school services. As described above, all three schools are currently operating below their design capacity. However, these schools will be used to house future students from the approved Laguna Ridge Specific Plan (7,400 homes), Sterling Meadows (1,184 homes), and the Southeast Policy Area (4,000 homes) (EGUSD 2016).

It is anticipated that Elk Grove Elementary School will exceed its design capacity by 2021 and Joseph Kerr Middle School and Elk Grove High School will exceed design capacity by 2025 and may not have capacity to accommodate the students who would reside in the Project site (EGUSD 2016). The EGUSD's School Facilities Needs Analysis indicates that the Laguna Ridge South Elementary School, which would be located along Poppy Ridge Road, approximately 2.5 miles west of the Project site, and Crooked Creek Estates Elementary School, which would be located on Wyman Drive approximately 0.5 mile north of the Project site, are anticipated to be designed and constructed in the next 5 to 6 years (ODELL Planning and Research 2020). While additional schools are under construction, it may be necessary to bus students to school facilities with available capacity. Transportation of future students to schools with additional capacity could result in indirect impacts related to transportation, such as air pollutant emissions, greenhouse gas emissions, and transportation noise – impacts that are analyzed in this SEIR based on assumptions for land use change within the Project site.

City General Plan Policy IFP-1-7 requires new development to fund its fair share portion of its impacts to all public facilities as provided for in State law. In addition, 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

² For the purposes of this analysis, it is assumed that all land designated for mixed use would consist of multifamily units. The EGUSD estimates a student yield of 0.2572 elementary school students (grades K-5), 0.0710 middle school student (grades 6-8), and 0.0806 high school (grades 9-12) per multifamily units.

³ The EGUSD estimates a student yield 0.093 students per 1,000 square feet of light and heavy industrial development ($5,635,967/1,000 \times 0.093 = 524$ students) and 0.196 students per 1,000 square feet of regional commercial development ($252,648/1,000 \times 0.196 = 50$ students).

State school bond program (City General Plan Policy CIF-4-3). Pursuant to SB 50, project applicants would be required to pay all applicable State-mandated school impact fees to EGUSD. As of June 2020, EGUSD's fees were \$6.34 per square foot for residential construction and \$0.66 for commercial construction, although these fees may increase by the time development is proposed (City of Sacramento Community Development Department 2020). The EGUSD 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). As with the 2019 SOIA EIR, this impact is considered **less than significant**.

Impact 3.13-4: Increased Demand for Parks and Recreation Facilities.

As with the 2019 SOIA EIR, the potential future development of mixed uses on the Project site could add dwelling units, which would lead to increased demand for parks and recreation facilities. An assumed 713 housing units, or 2,304 residents to the CCSD service area that would increase the demand for parks and recreation facilities. City and CCSD parkland standards require a minimum of 5 acres of developed parkland per 1,000 residents. This amount of residential development would require the development of an estimated 11.5 acres of parkland, using standards maintained by the City and CCSD. Any new residential development would be required to dedicate park and recreation facilities or pay applicable impact fees, per California Government Code Section 66477 (Quimby Act), the City of Elk Grove Municipal Code Chapter 22.40, and City General Plan Policy PT-1-3, or contribute to other fair share funding mechanisms required by the City as stated in General Plan Policy PT-1-5. These impact fees could fund the development of a new park or the maintenance of existing parks. As with the 2019 SOIA EIR, this impact is considered **less than significant**.