
5.11 PUBLIC SERVICES AND RECREATION

5.11 PUBLIC SERVICES AND RECREATION

This section discusses potential environmental impacts associated with public facilities and services that would serve the Planning Area. Public services include fire protection, law enforcement, schools, parks and recreation, and libraries.

5.11.1 FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES

FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES EXISTING SETTING

Cosumnes Community Services District Fire Department

Fire protection services in the Planning Area are provided by the Cosumnes Community Services District (CCSD). Services include fire suppression, emergency medical services, technical rescue, and arson and explosion investigations in a 157-square-mile service area covering the City, Galt, and a portion of unincorporated southern Sacramento County. The service area encompasses a population of more than 185,000. The CCSD has 175 personnel in its Operations Division and operates out of eight fire stations with eight advanced life support (ALS) engine companies, one aerial ladder truck company, six rescue ambulance units, and one command vehicle, as well as other specialized apparatus for specialized emergency circumstances (CCSD 2017a). In 2016, the CCSD responded to 18,592 incidents, an 8.2 percent decrease from 2015. The CCSD's fire stations are at the following locations:

- Fire Station 45, 229 5th Street, central Galt
- Fire Station 46, 1050 Walnut Avenue, northeast Galt
- Fire Station 71, 8760 Elk Grove Boulevard
- Fire Station 72, 10035 Atkins Drive
- Fire Station 73, 9607 Bond Road; this station provides fire and emergency medical services
- Fire Station 74, 6501 Laguna Park Drive
- Fire Station 75, 2300 Maritime Drive
- Fire Station 76, 8545 Sheldon Road

In addition, three new fire stations are planned in the Planning Area: (1) Station 77 to be located within the Laguna Ridge Specific Plan Area near Whitelock Parkway; (2) Station 78, to be located within the South Pointe Land Use Policy Area near Kammerer Road; and (3) Station 79 to be located within the Eastern Elk Grove Community Plan Area near Grant Line Road.

Wildland Fire Hazards

Wildland fire hazards in the Planning Area are limited; there are no moderate, high, or very high fire hazard severity zones identified by the California Department of Forestry and Fire Protection (Cal Fire) in or adjacent to the Planning Area. However, the Sacramento County Local Hazard Mitigation Plan Update (LHMP) indicates the probability of a wildfire is highly likely and could be extensive geographically, and that climate change may be a factor in the probability of future occurrence (Sacramento County 2016: Table ES-2). Wildland fire hazard is discussed further in Section 5.8, Hazards and Hazardous Materials.

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FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES REGULATORY FRAMEWORK

State

California Occupational Safety and Health Administration

In accordance with the California Code of Regulations, Title 8, Sections 1270 "Fire Prevention" and 6773 "Fire Protection and Fire Fighting Equipment," the California Occupational Safety and Health Administration has established minimum standards for fire suppression and emergency medical services. The standards include 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.

Uniform Fire Code

The Uniform Fire Code (Fire Code) (California Code of Regulations, Title 24, Part 9) contains regulations relating to construction, maintenance, and use of buildings. Topics addressed in the Fire 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 Fire Code also contains specialized technical regulations related to fire and life safety.

California Health and Safety Code

State fire regulations are set forth in Sections 13000 et seq. of the California Health and Safety Code. Regulations address building standards, fire protection and notification systems, fire protection devices such as extinguishers, smoke alarms, high-rise buildings, child care facility standards, and fire suppression training, among other topics.

Local

Elk Grove Municipal Code Chapter 16.85 Elk Grove Fire Fee

Municipal Code Chapter 16.85 establishes a fee program to fund the cost of capital facilities, the need for which is generated by the type and level of development designated in the current General Plan (City of Elk Grove 2003). The fee program applies to both residential and nonresidential development.

Elk Grove Municipal Code Chapter 17.04 California Fire Code

Municipal Code Chapter 17.04 codifies the City's adoption of the 2016 California Fire Code in its entirety.

FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES IMPACTS AND MITIGATION MEASURES

Standards of Significance

The impact analysis provided below is based on the following CEQA Guidelines Appendix G threshold of significance. A project is considered to have a significant effect on the environment if it will:

- 1) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, 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.

Methodology

The following impact analysis is based on a review of the proposed Land Use Diagram and General Plan policies related to fire protection and emergency medical services as well as discussions with CCSD Fire Department staff.

General Plan Policies and Standards

The proposed General Plan contains the following policies and standards for managing future development in the City to ensure adequate public services are provided for future development.

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.

Standard ER-4-1.b: Require the installation of earthquake-triggered automatic gas shut-off sensors in high-occupancy facilities and in industrial and commercial structures.

Policy ER-4-2: Work with the CCSD to develop a fire prevention plan that lists major fire hazards, proper handling and storage procedures for hazardous materials, potential ignition sources and their control, and the type of fire protection equipment necessary to control each major hazard.

Policy SAF-1-3: Coordinate with the CCSD Fire Department to ensure that new station siting and resources are available to serve local needs.

Policy SAF-1-4: Expand emergency response services as needed due to community growth.

Project Impacts and Mitigation Measures

Fire Protection and Emergency Medical Services

Impact 5.11.1.1 Implementation of the proposed Project would increase demand for fire protection and emergency medical services, which could trigger the need for additional fire stations, the construction of which could result in impacts on the physical environment. This impact would be **less than significant**.

Implementation of the proposed Project in accordance with the proposed Land Use Diagram would result in new development and associated population growth, which would increase demand for fire protection and emergency medical services, thus requiring additional

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firefighters, paramedics, and other personnel. This increase in population is discussed in Section 3.0, Demographics, and the environmental impacts associated with the population increase are addressed throughout the technical sections (Sections 5.1 through 5.13) of this EIR.

Developed areas of the Planning Area are adequately served by the CCSD's existing fire stations and substantial new growth is not anticipated in these areas under the proposed Project. Where new growth areas within the City have been identified, new fire stations are planned to accommodate the anticipated growth. Because the timing of development that would occur in the Planning Area is not yet known, the physical impacts of construction of these facilities cannot be evaluated at this time.

Existing Regulations and Standards and Proposed General Policies That Provide Mitigation

Prior to development in the Study Areas, the City will require preparation of specific plans or other master planning, which would identify sites and funding sources for future stations determined necessary to meet anticipated demand. CEQA review of project-level impacts of future community plans would also be required, and would evaluate the environmental effects of any new facilities. Proposed General Plan Policies ER-4-1 and ER-4-2 are intended to reduce fire risk in the Planning Area by encouraging cooperation between the City and the CCSD as well as development of a fire prevention plan. Policies SAF-1-3 and SAF-1-4 call for coordination with the CCSD Fire Department to ensure that new station siting and resources are available to serve local needs and emergency response services are expanded as needed due to community growth.

The CCSD Fire Department receives its funding through property taxes, fees for service, and grant funding and can, therefore, fund expanded services as new development occurs. Pursuant to Municipal Code Chapter 16.85, Elk Grove Fire Fee, all new development projects would be required to pay fire protection development fees to fund additional facilities and equipment. These funds would help to pay for costs associated with the development of new fire stations, if needed, including any required environmental analysis.

Conclusion

Buildout of the Planning Area in accordance with the proposed Project would increase the number of residents and jobs in the City, which would increase demand for fire protection and emergency medical services. Compliance with applicable regulations and proposed General Plan policies would ensure new fire station siting and resources are available and that required environmental review would be conducted as specific fire protection facilities are proposed. Impacts associated with the construction of needed fire protection facilities would not exceed construction impacts disclosed in the technical sections of this EIR. Therefore, impacts related to the provision of fire services would be **less than significant**.

Mitigation Measures

No additional mitigation required beyond compliance with existing regulations and proposed General Plan policies.

FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES CUMULATIVE SETTING, IMPACTS, AND MITIGATION MEASURES

Cumulative Setting

The cumulative setting for fire and emergency medical services includes all approved, proposed, and reasonably foreseeable development projects in the service area of the CCSD Fire Department.

Cumulative Impacts and Mitigation Measures

Cumulative Impacts to Fire Protection and Emergency Medical Services

Impact 5.11.1.2 Implementation of the proposed Project, in combination with other development within the CCSD's service area, would increase demand for fire protection and emergency medical services. This impact would be **less than cumulatively considerable**.

With adoption and implementation of the Project, proposed, approved, and reasonably foreseeable development in the CCSD service area would increase the demand for fire protection and emergency medical services, which would result in the need for new fire protection facilities, the construction of which could result in physical environmental effects. This is a potentially significant cumulative impact.

Funding from property taxes, development impact fees, and other sources of funding would provide sufficient resources to expand the department's staff, equipment, and facilities to accommodate future growth within the CCSD service area. In addition, as described previously, the City requires preparation of community plans prior to development in the Study Areas, which would determine the need for new stations and, if necessary, identify sites and funding sources. Further CEQA review of project-level impacts would be required prior to development of any new facilities. Implementation of applicable regulations and policies contained in the proposed Project would ensure further environmental review would be conducted as specific facilities are proposed, which would reduce the proposed Project's contribution to this impact to **less than cumulatively considerable**.

Mitigation Measures

No additional mitigation required beyond compliance with existing regulations and proposed General Plan policies.

5.11.2 LAW ENFORCEMENT

LAW ENFORCEMENT EXISTING SETTING

City of Elk Grove Police Department

The City of Elk Grove Police Department (EGPD) was provided at incorporation through a contract with the Sacramento County Sheriff's Department. The City created its own police department on October 28, 2006, with service boundaries that are contiguous with the City limits. The EGPD provides all law enforcement services in the service boundaries, including

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responding to crime-related events, handling traffic-related issues, and providing community services to the residents of Elk Grove.

The EGPD operates primarily out of two facilities located in the City Hall complex at 8380 and 8400 Laguna Palms Way. The service area is split into five police beats that are regularly patrolled. The EGPD has an authorized strength of 141 sworn officers and 86 civilian personnel and responds to an average of 52,000 calls for service per year (EGPD 2017).

California Highway Patrol

The California Highway Patrol (CHP) provides traffic regulation enforcement, emergency accident management, and service and assistance on State roadways, as well as traffic regulation enforcement throughout the State (including in the City), from its station located at 6 Massie Court, near the interchange of Mack Road and State Route (SR) 99. The CHP patrols all of Sacramento County south of the American River, which includes I-5 and SR 99 (City of Elk Grove 2003, p. 11-6).

LAW ENFORCEMENT REGULATORY FRAMEWORK

There are no federal, State, or local regulations related to law enforcement services associated with the proposed Project.

LAW ENFORCEMENT IMPACTS AND MITIGATION MEASURES

Standards of Significance

The impact analysis provided below is based on the following CEQA Guidelines Appendix G threshold of significance. A project is considered to have a significant effect on the environment if it will:

- 1) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, 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.

Methodology

The following impact analysis is based on consultation with the EGPD as well as a review of proposed General Plan policies.

General Plan Policies and Standards

The proposed General Plan contains the following policies and standards for managing future development in Elk Grove to ensure adequate law enforcement services are provided for future development.

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.

Project Impacts and Mitigation Measures

Impacts to Law Enforcement Services

Impact 5.11.2.1 Implementation of the proposed Project would increase demand for law enforcement services, which could trigger the need for additional law enforcement facilities, the construction of which could result in impacts on the physical environment. This impact would be **less than significant**.

Buildout of the Planning Area in accordance with the proposed Project would increase the number of residents and jobs in the City, which would increase demand for law enforcement services. The EGPD would need to hire additional officers and other staff to accommodate this increased demand. The environmental impacts associated with the increase in population are evaluated in Section 3.0, Demographics as well as throughout the technical sections (Sections 5.1 through 5.13) of this EIR.

The EGPD operates out of a centralized facility at the City Hall complex and does not currently use any other facilities, such as substations. Assuming continued operation of the centralized facility, with the addition of new patrols in newly developed areas, the developed areas of the City and identified growth areas could be adequately served by this existing facility and no new facilities would be required. However, the community planning process for the Study Areas could identify sites and funding sources for future police substations or other facilities if determined necessary to meet anticipated demand. If such facilities are required, further CEQA review of project-level impacts would be conducted prior to any development. If new facilities are required to be constructed, however, the impacts of these facilities would not exceed the impacts assumed as part of development of the Planning Area and analyzed throughout this EIR.

Existing Regulations and Standards and Proposed General Plan Policies That Provide Mitigation

Proposed General Plan Policy SAF-1-1 directs regular monitoring and review of the level of police staffing provided in Elk Grove and to ensure that sufficient staffing and resources are available to serve local needs. Similar to funding for fire protection services, new staff and equipment necessary to provide additional law enforcement services would be funded by development impact fees, which would be required to be paid by all proposed development within the Planning Area, as well as by ongoing payments of property taxes.

Conclusion

Buildout of the Planning Area in accordance with the proposed Project would increase the number of residents and jobs in the City, which would increase demand for law enforcement services. Because additional police services to accommodate development can be accomplished through additional personnel and equipment, the physical impacts associated with the provision of law enforcement services would be **less than significant**.

Mitigation Measures

No additional mitigation required beyond compliance with existing regulations and General Plan policies.

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LAW ENFORCEMENT CUMULATIVE SETTING, IMPACTS, AND MITIGATION MEASURES

Cumulative Setting

The cumulative setting for law enforcement services includes all approved, proposed, and reasonably foreseeable development projects in the Planning Area, which is the area served by the EGPD.

Cumulative Impacts and Mitigation Measures

Cumulative Law Enforcement Impacts

Impact 5.11.2.2 Implementation of the proposed Project, in combination with other development in the Planning Area, would increase demand for law enforcement services. The proposed Project's contribution to this impact would be **less than cumulatively considerable**.

Future development consistent with the existing General Plan that could occur in the current City limits could be adequately served by the EGPD. Thus, there would not be a significant cumulative impact without the proposed Project. Additional development in the Study Areas, as proposed by the Project, would further increase demands on police protection services. The proposed Project, in combination with other proposed, approved, and reasonably foreseeable development in the City, would contribute to a cumulative increase in the demand for law enforcement services.

As discussed above, the addition of new patrols in newly developed areas could be adequately served by the existing centralized facility; no new facilities would be required. If new facilities are determined necessary to serve future development, CEQA review of project-level impacts would be conducted for those facilities. Because the entire Planning Area is assumed for development, however, the physical impacts of facility construction would not exceed the impacts assumed as part of development of the Planning Area and analyzed throughout this EIR. Because additional police services to accommodate development can be accomplished through additional personnel and equipment, the proposed Project's contribution to this impact would be **less than cumulatively considerable**.

Mitigation Measures

No additional mitigation required beyond compliance with existing regulations and General Plan policies.

5.11.3 PUBLIC SCHOOLS

PUBLIC SCHOOLS EXISTING SETTING

The City is located within the service area of the Elk Grove Unified School District (EGUSD). The EGUSD covers 320 square miles and is the fifth largest school district in California and the largest in Northern California (CDE 2017). The EGUSD boundaries encompass the entire City, portions of the Cities of Sacramento and Rancho Cordova, and most of southern Sacramento County. Currently, the EGUSD provides education to over 62,000 students and operates 66 schools: 42 elementary schools, 9 middle schools, 9 high schools, 1 alternative education school, 4 continuation schools, and 1 special education school. As shown in **Table 5.11.3-1**, enrollment in

the EGUSD has remained essentially unchanged since the 2011/12 school year (2011). The EGUSD's average classroom size in the 2015/16 school year was 21.3, which was lower than the County and State averages of 24.0 and 25.4, respectively (EDP 2018).

**TABLE 5.11.3-1
ELK GROVE UNIFIED SCHOOL DISTRICT ENROLLMENT BY GRADE (2011/12–2016/17)**

Enrollment by Grade	2011–12	2012–13	2013–14	2014–15	2015–16	2016–17
Kindergarten	4,483	4,470	4,588	4,721	4,869	4,961
Grade 1	4,586	4,624	4,583	4,425	4,158	4,353
Grade 2	4,651	4,593	4,627	4,676	4,507	4,210
Grade 3	4,611	4,715	4,647	4,705	4,762	4,656
Grade 4	4,622	4,641	4,820	4,734	4,791	4,863
Grade 5	4,678	4,715	4,731	4,851	4,786	4,873
Grade 6	4,766	4,766	4,805	4,813	4,929	4,936
Grade 7	4,875	4,835	4,866	4,942	4,978	5,071
Grade 8	4,918	4,850	4,904	4,901	4,995	5,013
Grade 9	4,975	4,850	4,865	4,918	4,860	4,984
Grade 10	4,698	4,941	4,812	4,836	4,880	4,841
Grade 11	4,792	4,659	4,885	4,766	4,819	4,867
Grade 12	5,006	4,994	4,843	5,035	4,898	4,925
Ungraded	462	484	523	565	535	509
Total	62,123	62,137	62,499	62,888	62,767	63,061

Source: EDP 2018

PUBLIC SCHOOLS REGULATORY FRAMEWORK

State

Leroy F. Greene School Facilities Act of 1998 (SB 50)

Proposition 1A/SB 50 (Chapter 407, Statutes of 1998) created the School Facility Program where eligible school districts can obtain State bond funds. State funding requires matching local funds, which generally come from developer fees. SB 50 significantly altered the system of fees that can be placed on new development in order to pay for the construction of school facilities. SB 50 also eliminated the ability of cities and counties to require full mitigation of school impacts, replacing it with the ability of school districts to assess fees to offset the costs associated with increasing school capacity due to new development. Three levels of developer fees were established by SB 50. Level 1 fees are currently capped at \$2.97 per square foot for new residential development and \$0.47 per square foot for commercial and industrial (nonresidential) development and age-restricted senior housing. As an alternative to Level 1 fees, school districts meeting certain criteria may collect Level 2 fees, which are calculated under a formula in SB 50. Level 3 fees are approximately double Level 2 fees and are implemented only when the State Allocation Board is not apportioning State bond funds. Proposition 1D, passed on November 7, 2006, precludes the implementation of Level 3 fees for the foreseeable future. Although SB 50

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states that payment of developer fees are “deemed to be complete and full mitigation” of the impacts of new development, there is potential that fees and State funding do not necessarily fully fund new school facilities.

The three levels of developer fees established by SB 50 are further described below.

- 1) Level 1 fees are base statutory fees. As of January 30, 2008, the maximum assessment for fees was \$2.97 per square foot of residential development and \$0.47 per square foot of commercial/industrial development and age-restricted senior housing.
- 2) Level 2 fees allow the school district to impose developer fees above the statutory levels, up to 50 percent of certain costs under designated circumstances. The State would match the 50 percent funding if funds are available.
- 3) Level 3 fees apply if the State runs out of bond funds after 2006, allowing the school district to impose 100 percent of the cost of the school facility or mitigation minus any local dedicated school monies.

In order to levy the alternate (Level 2) fee and qualify for 50 percent State-matching funds, a school district must prepare and adopt a school facilities needs analysis, apply and be eligible for State funding, and satisfy specified criteria. The ability of a city or county to impose fees is limited to the statutory and potential additional charges allowed by the act, as described above.

Local

Elk Grove Unified School District Funding

EGUSD operations are primarily funded through local property tax revenue that is first accrued in a common statewide pool, and then allocated to each school district based on average daily attendance. State law also permits the charging of development fees to assist the EGUSD in funding capital acquisition and improvements to programs for school facilities, based on documented justification that residential and nonresidential development projects generate students. The EGUSD allows the imposition of fees that can be adjusted periodically, consistent with SB 50. Developer fees, adopted by the Board of Education on May 16, 2017, are \$5.43 per square foot of residential space and \$0.56 per square foot of commercial/industrial space. The EGUSD also collects a Mello-Roos tax, with the taxes applied at various stages during project review and development.

PUBLIC SCHOOLS IMPACTS AND MITIGATION MEASURES

Standards of Significance

The impact analysis provided below is based on the following CEQA Guidelines Appendix G threshold of significance. A project is considered to have a significant effect on the environment if it will:

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

Methodology

To determine the proposed Project's impact on school facilities, student generation rates were obtained from the EGUSD. Based on these generation rates and the number of residential units proposed, this analysis estimates the number of elementary, middle, and high school students who would need to be accommodated by the EGUSD.

General Plan Policies and Standards

The proposed General Plan contains the following policies and standards related to the provision of public schools to serve the Planning Area:

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-4-2: Require specific plans and other land use master plans to identify existing and planned school sites within their project areas and to propose guidance for incorporating new schools into overall neighborhood design.

Project Impacts and Mitigation Measures

Public School Facilities

Impact 5.11.3.1 Implementation of the proposed Project would allow for future development in the Planning Area, which would result in an increase of school-aged children and require the construction of new public school facilities, the construction of which could have impacts on the physical environment. This impact would be **potentially significant**.

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With the anticipated development under the proposed Project, a substantial number of school-aged children would reside in the Planning Area, triggering the need for additional public school facilities. **Table 5.11.3-2** summarizes the EGUSD student generation rates from the School Facility Needs Analysis (EGUSD 2017).

**TABLE 5.11.3-2
STUDENT GENERATION RATES**

Grade Level	Single-Family Units	Multi-Family Units
Elementary K–6	0.4044	0.2108
Middle School 7–8	0.1108	0.0541
High School 9–12	0.2004	0.1270

Source: EGUSD 2017

The student generation rates are for single-family and multi-family units. For the purposes of this analysis, it is assumed that all land designated high-density residential or mixed-use would be multifamily units; all land designated low-density residential, estate residential, or rural residential would be single-family units; and land designated medium-density residential would be 50 percent multifamily units and 50 percent single-family units. Dwelling units proposed are based on development capacity assumptions for the proposed Project. **Table 5.11.3-3**, which summarizes the Project's anticipated student generation, shows the proposed Project would be expected to generate a total of 28,608 school-aged children, including 15,981 kindergarten through sixth grade students; 4,315 seventh through eighth grade students; and 8,311 ninth through twelfth grade students.

**TABLE 5.11.3-3
STUDENT GENERATION**

	Dwelling Units Proposed		Student Generation			
	Single-Family	Multifamily	K–6	7–8	9–12	Total
City Limits	8,753	8,752	5,385	1,443	2,866	9,694
North Study Area	310	0	125	34	62	221
East Study Area	4074	737	1,803	491	910	3,204
South Study Area	11,278	4,697	5,551	1,504	2,587	9,642
West Study Area	6,050	3,183	3,118	843	1,617	5,578
		Subtotal	15,982	4,315	8,042	
					Total	28,339

Developed areas within the current City limits are adequately served by existing EGUSD schools. Anticipated growth under the proposed Project in the current City limits and the Study Areas would require new or expanded public school facilities. Where new growth in the existing City would occur, such as in approved specific plan areas, new school sites have been assumed as part of the planning process to accommodate the anticipated growth. Prior to development of the Study Areas, community plans would be prepared that would identify sites and funding sources for future schools as determined necessary to meet anticipated demand.

Existing Laws and Proposed General Plan Policies That Mitigate Impacts

Proposed General Plan Policy CIF-4-2 requires specific plans and other land use master plans to identify future school sites and propose guidance for incorporating new schools into overall neighborhood design.

California Government Code Section 65995(h) states that "the payment or satisfaction of a fee, charge or other requirement levied or imposed...[is] deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization as defined in Section 56021 or 56073, on the provision of adequate school facilities." All residential development within the Planning Area would be subject to the EGUSD residential fee in place at the time an application is submitted for a building permit. Under CEQA, payment of EGUSD residential development fees is considered to fully mitigate the need for school facilities generated by Project implementation.

Conclusion

The proposed Project would increase enrollment in the EGUSD, which could exceed school capacities. Exceeding school capacity would not be considered a physical impact under CEQA, and payment of fees is considered full mitigation. Policy CIF-4-2 requires specific plans and other land use master plans to identify future school sites and propose guidance for incorporating new schools into overall neighborhood design. Payment of fees is considered full mitigation related to school capacity.

Construction or expansion of public school facilities to accommodate population growth could result in significant impacts on such resources as aesthetics, air quality, biology, cultural resources, geology, hazards and hazardous materials, water quality, noise, and transportation. Because the location of any such public school facility has not been determined, it is speculative to address any precise environmental impacts associated with them. The actual impacts of new school facilities would depend upon the specific type and location of those facilities, and therefore project-specific environmental review would be required. Because the entire Planning Area is assumed for development, however, the physical impacts of facility construction would not exceed the impacts assumed as part of development of the Planning Area and analyzed throughout this EIR. Nonetheless, because school facilities would be constructed by the EGUSD, which is not subject to local regulations or any proposed General Plan policies, this impact would be **potentially significant**.

Mitigation Measures

No additional feasible mitigation available beyond compliance with existing laws and proposed General Plan policies.

While the EGUSD could and should implement measures to reduce physical environmental effects of school development, the EGUSD is not subject to mitigation adopted by the City. No enforceable measures are available. Therefore, this impact would remain **significant and unavoidable**.

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PUBLIC SCHOOLS CUMULATIVE SETTING, IMPACTS, AND MITIGATION MEASURES

Cumulative Setting

The cumulative setting for the proposed Project is the service area of the EGUSD.

Cumulative Impacts and Mitigation Measures

Cumulative Public School Impacts

Impact 5.11.3.2 Implementation of the proposed Project, in combination with other development in the EGUSD service area, would result in the increase of school-aged children, which would require the construction of new public school facilities, which could have impacts on the environment. This impact would be **cumulatively considerable**.

As noted above, the EGUSD boundaries encompass not only the Planning Area, but portions of the cities of Sacramento and Rancho Cordova, and most of southern Sacramento County. The EGUSD (2017) determined in the facility needs analysis that it is currently lacking capacity for 7,244 grades K–6 students, 359 grades 7–8 students, 129 grades 9–12 students, and 1,240 Special Day Class Severe students. Given the EGUSD's current shortage of classroom space and the potential for additional development to further increase demand for school space, and thus school construction, the cumulative impact is considered significant.

Implementation of the proposed Project, in combination with the existing shortage in class space and other planned and approved projects in the EGUSD service area, would increase the student population in the district, requiring the expansion of existing facilities or construction of new facilities. Construction of these facilities would be similar to that identified throughout this EIR for development within the Planning Area. While the proposed Project includes policies to ensure development in the Planning Area would be reduced to the extent feasible, these policies would not apply to the EGUSD. Therefore, the Project's contribution to this impact would be **cumulatively considerable**.

Mitigation Measures

No additional feasible mitigation available beyond compliance with existing laws and proposed General Plan policies.

While the EGUSD could and should implement measures to reduce physical environmental effects of school development, the EGUSD is not subject to mitigation adopted by the City. No enforceable measures are available. Therefore, this impact would remain **significant and unavoidable**.

5.11.4 PARKS AND RECREATION

PARKS AND RECREATION EXISTING SETTING

Cosumnes Community Services District

The CCSD provides parks and recreation services to the City through its Parks and Recreation Department. CCSD parks and recreation services operate exclusively within the local

community. The CCSD encompasses an area bounded on the north by Calvine Road, on the south by Twin Cities Road, and on the east by Grant Line Road. The western boundary of the CCSD is approximately 1.5 miles west of I-5 (CCSD 2009).

The CCSD plans and designs new parks; owns, operates, and maintains parks and community centers; manages rentals of community centers, picnic sites, and sports fields; and offers recreation programs. Currently, the CCSD manages 98 parks, 18 miles of off-street trails, 2 community centers, 4 recreation centers, and 2 aquatics complexes. Within the City, as of 2016, there are 883.3 acres of parkland. The Parks and Recreation Department has a staff of 68 full-time employees (CCSD 2017b).

The City and the CCSD maintain a goal of providing a minimum of 5 acres of active use parkland per 1,000 residents (CCSD 2009).

The CCSD also provides recreation services and recreation programs for all ages, including special events, preschools, summer camps, teen programs, special interest classes, before- and after-school recreation, nontraditional sports, therapeutic recreation, youth and adult sports, and aquatic programming (CCSD 2017b).

The City and CCSD have entered into a Memorandum of Understanding (MOU) concerning the development of park and recreation facilities in the City. The MOU addresses funding, programming, construction, ownership, and maintenance of park and recreational facilities in the geographic limits of the City.

Park Descriptions and Park Design Principles

Following are the park categories and associated descriptions and design principles used by the CCSD and the City in park facility planning and design (CCSD 2009).

The CCSD is preparing an update to the Parks and Recreation Master Plan. As part of the Parks and Recreation Master Plan, the City and CCSD will jointly adopt amendments to the Park Design Principles, which establish requirements for the siting and sizing of new park facilities, as well as the design characteristics for these facilities. The update to the Parks and Recreation Master Plan and the Park Design Principles is being coordinated with the proposed Project, as these describe the service area and design objectives for new parks and recreation facilities in the community.

Local Park

Local parks generally range from one to three net acres and include amenities such as playgrounds targeted for ages 2 to 5 and 5 to 12, small sport court, swings, benches, and landscaping. Local parks typically have a localized service radius of approximately one-quarter mile and include passive and active land usage, reflecting the overall standards of the entire park system. Local parks serve limited and/or isolated recreational needs. Neighborhood Parks

A neighborhood park should be 3 to 10 acres; however, some neighborhood parks are determined by use and facilities offered and not by size alone. The service radius for a neighborhood park is one-half mile or six blocks. Neighborhood parks should have safe pedestrian access for surrounding residents; parking may or may not be included but, if included, accounts for less than ten cars and provides ADA access. Neighborhood parks serve as the recreational and social focus of the adjoining neighborhoods and contribute to a distinct neighborhood identity.

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Community Park

Community parks generally range from 20 to 100 acres, and are designed to be accessible to multiple neighborhoods and focus on meeting community-based recreational needs, as well as preserving unique landscapes and open spaces. Community parks are generally larger in scale than neighborhood parks, but smaller than regional parks, and are designed for residents who live within a one- to two-mile radius. When possible, the park should be developed adjacent to a school.

Community parks provide recreational opportunities for the entire family and often contain facilities for specific recreational purposes such as the following: athletic fields, aquatic center, tennis courts, multipurpose recreation center, loop trails, picnic areas, reservable picnic shelters, sports courts, permanent restrooms, large playgrounds for both age 2 to 5 and 5 to 12, large turfed and landscaped areas, and a playground or spray ground. Passive outdoor recreation activities such as meditation, quiet reflection, and wildlife watching also take place at community parks.

Regional Park

Regional parks serve a large area of several communities, residents within a city or county, or across multiple counties. Depending on activities within a regional park, users may travel as many as 60 miles for a visit. Regional parks include recreational opportunities such as soccer, softball, golf, boating, camping, conservation-wildlife viewing, and fishing. Although regional parks usually have a combination of passive areas and active facilities, they are likely to be predominantly natural resource-based parks.

Regional parks are commonly 100 to 1,000 acres, but some can be 2,000 to 5,000 acres in size. A regional park focuses on activities and natural features not included in most types of parks and are often based on a specific scenic or recreational opportunity. Facilities could include those found in a community park as well as specialized amenities such as an art center, amphitheater, boating facility, golf course, or natural area with interpretive trails. Regional parks can and should promote tourism and economic development, as they can enhance the economic vitality and identity of the entire region.

Sports Complex

Sports complexes at community parks and stand-alone sports parks are developed to provide 4 to 16 fields or courts in one setting. A sports complex may also support extreme sports facilities, such as BMX and skateboarding. Sports complexes can be single-focused or multi-focused and can include indoor or outdoor facilities to serve the needs of multiple users. Outdoor fields should be lighted to maximize value and productivity of the complex. Agencies developing sports complexes focus on meeting the needs of residents. This may include facilities appropriate for attracting sport tournaments.

Special Use Park/Facility

Special use facilities are those spaces that do not fall within a typical park classification. A major difference between a special use facility and other parks is that they usually serve a single purpose, whereas other park classifications are designed to offer multiple recreation opportunities. It is possible for a special use facility to be located inside another park. Special use facilities generally fall into one of the following categories:

- Historic/Cultural/Social Sites – Unique local resources offering historical, educational, and cultural opportunities. Examples include historic downtown areas, commercial zones, plaza parks, performing arts parks, arboretums, display gardens, performing arts facilities, indoor theaters, churches, and amphitheaters. Frequently, these are located in community parks.
- Golf Courses – Nine- and 18-hole complexes with ancillary facilities such as clubhouses, driving ranges, program space, and learning centers. These facilities are highly maintained and can support a wide age range. Programs are targeted for daily use play, tournaments, leagues, clinics, and special events. Operational costs come from daily play, season pass holders, concessions, driving range fees, earned income opportunities, and sale of pro shop items.
- Indoor Recreation Facilities – Specialized or single-purpose facilities. Examples include multipurpose recreation centers and community theaters. Frequently, these are located in community parks.
- Outdoor Recreation Facilities – Examples include aquatic parks, disc golf, skateboard, BMX, and dog parks, which may be located in a park.

Greenbelt/Trail/Paseo

Greenbelts, trails, and paseos are recognized for their ability to connect people and places and often include either paved or decomposed granite trails. Trails can also be loop trails in parks. Linking neighborhoods, parks, recreation facilities, attractions, and natural areas with a multiuse trail fulfills two guiding principles simultaneously: protecting natural areas along river and open space areas and providing people with a way to access and enjoy them. Multiuse trails also offer a safe, alternative form of transportation, substantial health benefits, habitat enhancements for plants and wildlife, and unique opportunities for outdoor education and cultural interpretation.

Open Space/Natural Area

Open space and natural areas are undeveloped but may include natural or paved trails. Grasslands under power line corridors are one example; creek areas are another. Open spaces often contain natural resources that can be managed for recreation and natural resource conservation values such as a desire to protect wildlife habitat, water quality, and/or endangered species. Open spaces also can provide opportunities for nature-based, unstructured, low-impact recreational opportunities such as walking and nature viewing.

Funding

Landscape and Lighting Assessment District Funds

The CCSD's Landscape and Lighting Assessment District was originally formed in 1994 and included nine benefit zones. Subsequent zones were formed and added to the CCSD as the City developed. As of 2008, 13 geographic benefit zones, plus a district-wide benefit zone, have been created.

Fees are levied on parcels to help fund maintenance, repair, replacement, services, utilities, and capital improvements associated with parks, certain landscape medians owned by the City, corridors, trails, open space, and recreation facilities. The assessment rates in each zone are set to be consistent with the benefits received by the property owners paying the assessments in

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each zone. The facilities and benefits are specific to each zone; thus, the rates vary based on the number and types of facilities present in that zone and the costs required to maintain them (CCSD 2009).

Quimby Act Fees

Quimby Act fees are collected from developers in lieu of land dedication for parks and recreation facilities. The revenues must be used "for the purpose of developing new or rehabilitating existing neighborhood or community parks or recreational facilities to serve the subdivision." California Government Code Section 66477 provides the authority and formula for the dedication or the payment of fees for subdivisions. The City conditions projects for the payment of Quimby fees, while the CCSD administers the fee collection.

Park Development Impact Fees

Park development impact fees (park fees) are a revenue source approved as part of a public facility financing plan. These fees are collected from developers at the time a building permit is issued. The revenue must be used to benefit the residents of the planning area from which the fee was collected. Park fees are collected in the East Franklin and Eastern Elk Grove areas, including the Elk Grove/West Vineyard and Eastern Elk Grove fee programs.

California Government Section 66000 et seq. sets forth the procedural requirement for establishing and collecting park fees. These procedures require that "a reasonable relationship or nexus must exist between a governmental exaction and the purpose of the condition."

Other Sources of Funding

New park facilities are also funded through property taxes, Mello-Roos funds, and grants. In addition, the City has identified six plan area development impact fee programs that are used to fund parks and related facilities in specific planning areas. These plan areas include Stonelake, Lakeside, Laguna West, Laguna Ridge, Eastern Elk Grove, and East Franklin.

PARKS AND RECREATION REGULATORY FRAMEWORK

State

Quimby Act

The goal of the 1975 Quimby Act (California Government Code Section 66477) was to require developers to help mitigate the impacts of property improvements by requiring them to set aside land, donate conservation easements, or pay fees for park improvements. The Quimby Act gave authority for passage of land dedication ordinances only to cities and counties, thus requiring special districts to work with cities and/or counties to receive parkland dedication and/or in-lieu fees. The fees must be paid and land conveyed directly to the local public agencies that provide parks and recreation services community-wide. Revenues generated through the Quimby Act cannot be used for the operation and maintenance of park facilities (Westrup 2002).

Originally, the Quimby Act was designed to ensure "adequate" open space acreage in jurisdictions adopting Quimby Act standards (e.g., 3 to 5 acres per 1,000 residents). In some California communities, the acreage fee was very high where property values were high, and many local governments did not differentiate on their Quimby fees between infill projects and

greenbelt developments. In 1982, the Quimby Act was substantially amended via AB 1600. The amendments further defined acceptable uses of or restrictions on Quimby funds, provided acreage/population standards and formulas for determining the exaction, and indicated that the exactions must be closely tied (nexus) to a project's impacts as identified through traffic studies required by CEQA. AB 1600 requires agencies to clearly show a reasonable relationship between the public need for the recreation facility or parkland and the type of development project on which the fee is imposed (Westrup 2002). Cities or counties with a high ratio of parkland to inhabitants can set a standard of 5 acres per 1,000 residents for new development; those with a lower ratio can only require the provision of up to 3 acres of parkland per 1,000 residents. The calculation of this parkland-to-population ratio is based on a comparison of the population count of the last federal census to the amount of city- or county-owned parkland.

Local

City of Elk Grove – Park and Recreation Dedication and Fees

Municipal Code Chapter 22.40 requires tentative subdivision and tentative parcel map applicants to dedicate land or pay an in-lieu fee for the development of neighborhood and community parks, and provides a formula for calculating the in-lieu fee. The parkland acquisition and development standard is 5 acres per 1,000 residents when not located in Laguna Ridge.

Parks and Recreation Master Plan

The Parks and Recreation Master Plan is a joint document prepared and approved by the CCSD and the City. The Master Plan was developed to guide both agencies in providing parks and recreation opportunities for residents in the City and in the CCSD boundaries. The Master Plan establishes a clear direction for the CCSD's core services and responsibilities, defines service priorities and capital investments, and outlines the manner in which the parks and recreation facilities and program services will be funded and delivered (CCSD 2009).

Elk Grove Bicycle, Pedestrian and Trails Master Plan

The Elk Grove Bicycle, Pedestrian and Trails Master Plan (2014) is the expression of the City's desire to have an exemplary off-street multiuse trail system that provides connectivity throughout the City and the wider Sacramento region in order to offer recreational opportunities and an alternative method for transportation for City residents. To achieve this trail system, the City acknowledges the necessity to provide direction on where trails should be located; set design standards and guidelines to describe the desired characteristics of trails; identify funding sources for trail planning, construction, and maintenance; establish prioritization criteria for which trail projects to implement first; and describe the City and interagency collaborative actions required to create the trail system. The City Council adopted the first Trails Master Plan in January 2007, but the plan is continually updated as goals are achieved, as new funding sources become available. The current plan was adopted in 2014.

PARKS AND RECREATION IMPACTS AND MITIGATION MEASURES

Standards of Significance

The impact analysis provided below is based on the following CEQA Guidelines Appendix G threshold of significance. A project is considered to have a significant effect on the environment if it will:

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- 1) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for parks.

Methodology

The following impact analysis is based on the development potential of the proposed Project (see **Table 2.0-2** in Section 2.0, Project Description) as well as the Parks and Recreation Master Plan and the City's park standards.

General Plan Policies and Standards

The proposed Project contains the following policies and standards for managing future development in the City to ensure adequate park and recreation facilities are provided for future development.

- Policy PT-1-1:** Work in conjunction with the CCSD to provide parks and recreation services for Elk Grove residents in accordance with the Parks and Recreation Master Plan, the Park Design Principles, and the Bicycle, Pedestrian, and Trails Master Plan.
- Policy PT-1-2:** Land use and management of parks and facilities will be provided in conjunction with all other agencies that provide park and trail 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-1-4:** Promote investment in and upgrades to park infrastructure and services within the City's limited role under the Memorandum of Understanding with the CCSD.
- 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.
- Policy PT-1-6:** Work with the CCSD to provide designated park and open space areas in growth areas, and require developers to incorporate open space where appropriate as a condition of project approval.
- Policy PT-1-7:** Coordinate with the CCSD to prioritize the development of new parks and other recreational services, including low-impact facilities and equipment for older adults and the disabled, in underserved neighborhoods.
- Policy PT-1-8:** Encourage the CCSD to develop self-supporting recreation programs for those activities that go beyond basic recreation needs. Examples include outdoor and indoor swimming lessons or sports teams, and classes (such as a preschool or day care facility) or reading groups at community centers. The City may also develop and operate such programs independently.
- Policy PT-1-9:** The City encourages park development adjacent to school sites to allow for concurrent use of the facilities when appropriate.

- Policy PT-1-11:** Incorporate open space areas into all projects to the extent feasible.
- Policy PT-1-12:** Design projects adjacent to open space areas in a manner that protects the integrity and function of the open space area.
- Policy PT-1-14:** Where feasible, provide pedestrian, bicycle, and equestrian trails in open space areas, with an emphasis on trail connections to area-wide systems.
- Policy PT-2-1:** Work with nearby jurisdictions to plan for a connected network of trails and parks throughout the region that link to housing, employment and commercial centers, public transit, and community facilities.
- Policy PT-2-2:** Explore additional trail and path connections between parks, greenbelts, waterways, and regional open spaces to enhance access and recreational opportunities for the community.

Project Impacts and Mitigation Measures

Increased Demand for Park and Recreational Facilities

- Impact 5.11.4.1** Implementation of the proposed Project would increase requirements for park and recreation facilities, and trails, the construction of which could result in impacts on the physical environment. This impact would be **less than significant**.

Buildout of the Planning Area in accordance with the proposed Project would substantially increase the number of residents and jobs in the City, which would increase demand for parks and other recreational facilities. Within the City, as of 2016 there are 883.3 acres of parkland, which adequately serves the existing population of 171,059 at a ratio of approximately 5 acres per 1,000 residents. At buildout of the Planning Area, the City is projected to have a total population of 329,338. To meet the City standard of 5 acres of developed parkland per 1,000 residents, an additional 764 acres of developed parkland, at minimum, would need to be developed. Increased demand on existing facilities would also occur.

The Preferred Alternative Land Use Map (see **Figure 2.0-3** in Section 2.0, Project Description) identifies approximately 2,333 acres of land that would be designated parks and open space (including existing park and recreational facilities). A portion of this would count towards the City's parkland requirements, while the balance includes other open space areas including trails. In addition, individual development projects under the proposed Project would be reviewed to ensure consistency with the Elk Grove Bicycle, Pedestrian, and Trails Master Plan, which may result in the requirement for new or expanded bicycle routes and trails.

Construction or expansion of park, recreation, and trail facilities to achieve and maintain City standards and to accommodate future population growth could result in significant impacts on such resources as aesthetics, air quality, biology, cultural resources, geology, hazards and hazardous materials, water quality, noise, and transportation. Because the location of any such facilities has not been determined, determining any associated environmental impacts would be speculative at this time. Future new or expanded park facilities would be constructed within the Planning Area boundaries. Because the entire Planning Area is assumed for development, the physical impacts of facility construction would not exceed the impacts assumed as part of development of the Planning Area as analyzed in this EIR.

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Existing Regulations and Standards and Proposed General Plan Policies That Provide Mitigation

CCSD parkland standards, Municipal Code Chapter 22.40, and proposed General Plan Policy PT-1-3 require a minimum of 5 acres of developed parkland per 1,000 residents. The City requires that private developers proposing residential projects in the City either dedicate land for park facilities or pay a fee in lieu of providing parkland. These fees are collected by the City as part of the development review process and used for the purpose of developing new park facilities to serve the development for which the fees were paid.

In addition to parkland requirements established in Policy PT-1-3, Policy PT-1-5 requires assurance of funding for maintenance of parks and/or trails prior to City approval of any Final Subdivision Map that contain or contributes to the need for public parks and facilities. Policy PT-1-6 directs coordination with the CCSD to provide designated park and open space areas in growth areas, and requires developers to incorporate open space where appropriate as a condition of approval. Policies PT-1-9 encourages park development adjacent to school sites to allow for concurrent use of the facilities when appropriate.

As part of the CCSD's Parks and Recreation Master Plan update, the City and the CCSD will jointly adopt amendments to the Park Design Principles, which establish requirements for the siting and sizing of new park facilities, as well as the design characteristics for these facilities. The update to the Parks and Recreation Master Plan and the Park Design Principles is being coordinated with the proposed Project, as these describe the service area and design objectives for new parks and recreation facilities in the community.

Conclusion

Buildout of the Planning Area in accordance with the proposed Project would increase the use of existing and generate new demand for parkland and facilities. The dedication of land or payment of in-lieu fees, in combination with policies in the proposed General Plan, would ensure that impacts related to deterioration of existing parks and recreation facilities would not occur. New parkland and facilities would be constructed using development impact fees to ensure a minimum of 5 acres of developed parkland per 1,000.

As noted above, the City and the CCSD have entered into an MOU regarding delivery of some parks and recreation facilities within the City's existing boundaries. Development projects outside of the MOU areas that include the construction of recreation facilities would be subject to proposed General Plan policies and mitigation measures identified in this EIR to reduce physical environmental effects. The CCSD would be responsible for the construction of facilities in the MOU areas and would be required to comply with mitigation monitoring and reporting program (MMRP) from the relevant project-level CEQA document in which the park facilities would be located. Therefore, the construction of park facilities would be subject to policies, standards, and mitigation measures from the General Plan and this EIR, or the mitigation identified in project-specific MMRPs. The impacts of park construction would be **less than significant**.

Mitigation Measures

No additional mitigation required beyond compliance with proposed General Plan policies and construction-related mitigation identified in this EIR.

PARKS AND RECREATION CUMULATIVE SETTING, IMPACTS, AND MITIGATION MEASURES

Cumulative Setting

The cumulative setting for parks and recreation is the CCSD service area. The CCSD provides parks and recreation services to the City, and these services operate exclusively within the City.

Cumulative Impacts and Mitigation Measures

Cumulative Impacts to Park and Recreational Facilities

Impact 5.11.4.2 The proposed Project would result in a cumulative increase in demand for parkland and recreational facilities, the construction of which could impact the physical environment. This impact would be **less than cumulatively considerable**.

The CCSD provides parks and recreation services exclusively within the City. Therefore, the cumulative impact of providing parks and recreation services in the City would not differ from that described in Impact 5.11.4.1, and would not exceed impacts of provision of parks and recreation facilities for the proposed Project. The CCSD would be responsible for the construction of facilities in the MOU areas and would be subject to project-specific mitigation identified in applicable MMRPs and other park construction would be subject to policies, standards, and mitigation measures from the General Plan and this EIR, the cumulative impact would be significant. The proposed Project would not change the significance of the impact and the Project's contribution to the impact would be **less than cumulatively considerable**.

Mitigation Measures

No additional mitigation required beyond compliance with proposed General Plan policies and construction-related mitigation measures identified in this EIR.

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