

3.8 PUBLIC SERVICES AND RECREATION

This section provides an overview of existing public services in the City of Elk Grove and evaluates the potential for implementation of the General Plan Amendments and Update of VMT Standards (Project) to affect availability, service level, and/or capacity of public services, including fire-protection services, police-protection services, parks and recreation, and public schools, and, if such an effect is determined to occur, whether new or expanded facilities would be required that could result in a potentially significant impact to the environment. Other publicly provided utility services, such as water and wastewater treatment, solid waste, electricity, and natural-gas services, are addressed in Section 3.10, "Utilities and Service Systems." The primary source of information used for this analysis is the General Plan EIR (City of Elk Grove 2018, 2019), including updates to the Elk Grove Municipal Code, and recently approved City master plans.

No comments pertaining to public services and recreation were received in response to the notice of preparation (NOP).

3.8.1 Regulatory Setting

FEDERAL

No federal plans, policies, regulations, or laws are applicable to the provision of public services for the Project.

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.

California Fire Code

The California Fire Code (CFC) is contained within CCR Title 24. The CFC establishes requirements for development design to safeguard public health, safety and general welfare from the hazards of fire. This includes standards on building design, materials, fire flow, and other suppression provisions. The CFC also regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The CFC and the California Building Code use a hazard classification system to determine what protective measures are required to protect life and provide fire safety. These measures may include applying construction standards, requiring separation between structures and property lines, and using specialized equipment. To ensure that these safety measures are met, the CFC employs a permit system based on hazard classification. The CFC is updated every 3 years.

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.

Uniform Fire Code (Title 24, Part 9)

The 2022 Uniform Fire Code (Fire Code) (California Code of Regulations, Title 24, Part 9), effective January 1, 2023, 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.

Leroy F. Greene School Facilities Act

The Leroy F. Greene School Facilities Act (Chapter 407, Statutes of 1998) places limitations on cities and counties with respect to mitigation requirements for school facilities. It permits school districts to levy fees, based on justification studies, for the purposes of funding construction of school facilities, subject to established limits. The act further states that payment of these fees by a development project is considered adequate to reduce impacts of that project on schools to a less-than-significant level for the purposes of CEQA review and compliance.

School districts that can establish a need by completing an annually updated fee justification study are authorized to collect school impact fees on new residential and commercial/industrial development in accordance with Education Code Section 17620 and Government Code Section 65995. The development school impact fees are intended to provide the local school district's 50 percent share of the cost of new school construction.

The Elk Grove Unified School District (EGUSD) has established school mitigation fees for residential development at \$7.04 per square foot and \$0.78 per square foot for commercial/industrial development (EGUSD 2022a).

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.

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 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. 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.

Public Resources Code Section 21151.2

Public Resources Code (PRC) Section 21151.2 requires school district governing boards to give the relevant planning commission a written notice in writing of the proposed acquisition before acquiring title to property for a new school site or for an addition to an existing school site. The planning commission is responsible for investigating the proposed site and providing it, and any related recommendations, to the governing board. EGMC Section 23.10.030 specifies that the Elk Grove City Council shall be responsible for such investigations and recommendations.

Government Code Section 65402

California Government Code Section 65402 requires a school district, prior to acquiring real property, to submit the location, purpose, and extent of such acquisition to the Planning Agency having jurisdiction for a determination as to conformity with the general plan. EGMC Section 23.10.030 specifies that the Elk Grove City Council shall make determinations under this State code section.

Government Code Section 53094

A school district, with a two-thirds vote, may render a city zoning ordinance inapplicable to classroom facilities, except when the proposed use of the property by the school district is for non-classroom facilities. Before a school district can override a local zoning ordinance, it must first comply with expanded coordination and communication requirements. The district also must comply with pre-existing CEQA requirements regarding school site review before overriding local zoning.

LOCAL

City of Elk Grove General Plan

The City General Plan (City of Elk Grove 2019a) contains the following policies relevant to public services and the Project:

- ▶ **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.
- ▶ **Policy ER-4-2:** Work with the [Cosumnes Community Services District (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-1-2:** Encourage the use of Crime Prevention Through Environmental Design (CPTED) principles in the design of projects and buildings, as well as parks and trails.
- ▶ **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.
- ▶ **Policy INF-1-2:** Require that water flow and pressure be provided at sufficient levels to meet domestic, commercial, industrial, and firefighting needs.
- ▶ **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-1-8:** Infrastructure improvements must be financed and/or constructed concurrent with or prior to completion of new development.
- ▶ **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.

City of Elk Grove Municipal Code

Chapter 16.85: Elk Grove Fire Fee

The City established a fire fee to fund the cost of capital facilities (fire protection facilities and equipment) to meet fire protection service needs by the CCSD. This fee is paid at the issuance of building permits.

Chapter 17.04: California Fire Code

The City adopted the 2019 California Fire Code with some local amendments as set forth in Section 17.04.010. Section 17.04.020 designates the chief of the CCSD Fire Department or authorized designee the authority to enforce this chapter of the Municipal Code.

Elk Grove Unified School District Funding

Elk Grove Unified School District (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. Current developer fees are \$7.04 per square foot of residential space and \$0.78 per square foot of commercial/industrial space (EGUSD 2022a). The EGUSD also collects a Mello-Roos tax, with the taxes applied at various stages during project review and development.

City of Elk Grove - Park and Recreation Dedication and Fees

EGMC 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. EGMC Chapter 16.80 requires that new residential developments that are not part of a subdivision to dedicate land or pay an in-lieu fee for the development of neighborhood and community parks. The Chapter provides a formula for calculating the in-lieu fee. The parkland acquisition and development standard is 5 acres per 1,000 residents.

In addition to EGMC Chapters 16.80 and 22.40, the City and the Cosumnes Community Services District (CCSD) also have fee programs specific to park development, such as the Southeast Policy Area (SEPA) Park and Trail Fee, the Laguna Ridge Park Fee and Laguna Ridge Supplemental Park Fee, and the CCSD Park Fee. For example, developers of projects in SEPA are required to meet their Quimby obligation (park land dedication or in-lieu fee) pursuant to EGMC Chapters 22.40 or 16.80 and they are also responsible for paying the SEPA Park and Trail Fee, which goes toward park facilities, and trail land and facilities. EGMC Chapter 16.95.022 establishes the SEPA park and trail fee. The Laguna Ridge Specific Plan (LRSP) includes a parks fee for facility construction of new facilities. There is also the Laguna Ridge Supplemental Parks Fee Program, which provides funding for construction of all the local and community parks in LRSP, as well as the land component for parks and parkways that exceed the Quimby standard of 5 acres per 1,000 residents.

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 Parks and Recreation Department 2018).

Elk Grove Bicycle, Pedestrian, and Trails Master Plan

The Elk Grove Bicycle, Pedestrian, and Trails Master Plan (2021) 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 May 2021. Additionally, the City has prepared the Laguna Creek Inter-Regional Trail (LCIRT) Master Plan which aims to complement work started on the Elk Grove Bicycle, Pedestrian, and Trails Master Plan by providing greater detail, a holistic approach, and broader geographic scope related specifically to the LCIRT, and further improve connectivity throughout the City's network of trails.

3.8.2 Environmental Setting

FIRE PROTECTION

Fire protection services in the City are provided by 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 207,000 persons. The CCSD has 180 personnel in its Operations Division and operates out of eight fire stations and three facilities (CCSD 2022a). In 2021, the CCSD responded to 22,936 incidents, a 12.9 percent increase from 2020 (Gomez, pers. comm., 2022). The CCSD's fire stations are at the following locations (CCSD 2022b):

- ▶ 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
- ▶ Fire Station 74, 6501 Laguna Park Drive
- ▶ Fire Station 75, 2300 Maritime Drive
- ▶ Fire Station 76, 8545 Sheldon Road
- ▶ Fire Station 77, 83500 Poppy Ridge Road (under Construction)

In addition, two new fire stations are planned in the Planning Area: (1) Station 78, to be located along the southern boundary of the City limits near Promenade Parkway and Kammerer Road; and (2) Station 79 to be located within the Eastern Elk Grove Community Plan Area near Grant Line Road along Bradshaw Road.

LAW ENFORCEMENT

California Highway Patrol

The California Highway Patrol Valley Division provides services to the south Sacramento region from the division's South Sacramento office located at 6 Massie Court, Sacramento. The office patrols sections of Interstate 5, State Route 99, U.S. Highway 50, and Business 80, as well as 500 miles of unincorporated county roadways.

Elk Grove Police Department

Police protection services are provided by the Elk Grove Police Department (EGPD) for areas within the City. EGPD is headquartered at 8400 Laguna Palms Way. EGPD is divided into four divisions: the Operations Division, the Investigations Division, the Administrative Services Division, and the Support Services Division. The Operations Division (Patrol) is responsible for responding to calls for services and is made up of eight patrol teams, canine officers, school resource officers, and the crisis response team (EGPD 2019).

The EGPD has an authorized strength of 236 total personnel and 114 sworn officers (City of Elk Grove 2022). The Police Department responded to approximately 85,055 for service in 2022 (EGPD 2022). Note that calls for service and staffing related to animal services have been excluded from this analysis.

EGPD's officer-to-resident population ratio standard is 0.81 sworn police officers per 1,000 residents, and EGPD's response time goal is 5 minutes for Priority 1 calls, which are emergency calls that require immediate assistance from police to prevent serious injury, death, and/or to arrest a violent felon. In 2022, EGPD's actual response time was 5.4 minutes for Priority 1 calls, with 48 percent of calls for service under 5 minutes (Jacobson, pers. comm., 2023).

SCHOOLS

EGUSD provides educational services, including elementary, middle, and high schools, to the City. EGUSD operates 43 elementary schools, nine middle schools, nine high schools, three continuation schools, one K-12 independent study program, one charter school, one virtual online K-8 program and one special education school. In addition, the District offers preschool programs, an adult education program and a career training center for adults (EGUSD 2021a).

To identify school needs, EGUSD has developed a comprehensive districtwide Facilities Master Plan (FMP). The FMP is the blueprint for investments in the educational infrastructure. The FMP indicates that during the 2015-16 school year, there were a total of 63,232 students enrolled. The total number of students projected to be enrolled in EGUSD in 2025-26 is 76,859. This represents a projected increase of 13,600 students. Based on the projected District-wide increase of 13,600 students through 2025, the FMP forecasts the need for ten to twelve new schools through 2025, of which eight to ten are elementary schools with one middle school and one high school (EGUSD 2016).

PARKS AND RECREATION

The CCSD Parks and Recreation Department provides park and recreational services to the City and maintains more than 101 parks that, together, encompass more than 1,000 acres of parks, corridors, creeks, and trails in the Elk Grove community. According to *Plan for Play: Parks, Recreation and Facilities Master Plan*, approximately 5.26 acres of parkland were available per 1,000 population in 2017, and planned parklands would result in a park acreage standard of less than 5 acres per 1,000 population. The master plan concluded that community needs included visitor experiences (restrooms, shade, gathering places), off-street trails, major facilities (multipurpose recreation centers and aquatic centers), sports fields, and park facilities (CCSD Parks and Recreation Department 2018).

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. The most recent MOU was approved through Resolution 2019-214 (City of Elk Grove 2019b).

3.8.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

Evaluation of potential public service and recreation impacts are based on applicable City standards policies and a review of documents pertaining to the Project, including the General Plan EIR. Impacts on public services and recreation that would result from the Project were identified by comparing existing service capacity and facilities against future, new, or renovated facilities, the construction of which could have physical effects on the environment.

THRESHOLDS OF SIGNIFICANCE

A public services and recreation impact is considered significant if implementation of the Project would do any of the following:

- ▶ 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, to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:
 - fire,
 - police protection,
 - schools,
 - parks, and
 - other public facilities;
- ▶ 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; and/or

- ▶ include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Impact 3.8-1: Require Construction of New Fire Protection Facilities, Resulting in Adverse Environmental Impacts

The General Plan EIR determined that where new growth areas within the City have been identified, new fire stations are planned to accommodate the anticipated growth and no significant impacts would occur. Compliance with applicable regulations and existing General Plan policies would ensure new fire station siting and resources are available. If new fire protection facilities are proposed, environmental review for the new facility would be conducted as appropriate. Project impacts associated with the construction of needed fire protection facilities would not result in a new or substantially more severe construction impacts than disclosed in the technical sections of the General Plan EIR. Buildout projected under the Project would be required to comply with applicable regulations and policies. Therefore, impacts related to the provision of fire services would remain **less than significant**.

LEA Community Plan Area

Implementation of the Project would increase development capacity in the LEA Community Plan Area, which would result in associated population growth. This increase in population would increase demand for fire protection and emergency medical services, and could require additional firefighters, paramedics, and other personnel. In addition, new development in the LEA Community Plan Area beyond what was evaluated in Impact 5.11.1.1 of the General Plan EIR, may require construction of a new fire station to meet the needs of the LEA Community Plan Area. CCSD has identified a potential location for a future fire station located within the City's Planning Area near Promenade Parkway and Kammerer Road, which would improve emergency response time within the station's traditional service area and serve the LEA Community Plan Area. Construction of the new fire station would occur as the LEA Community Plan Area is built out and would increase fire protection resources and reduce the need for existing fire stations to serve the LEA Community Plan Area. Development of the new fire station in the LEA Community Plan Area would undergo a separate project-specific environmental review process as required by the City and impacts of the new station are not discussed herein.

Pursuant to EGMC Chapter 16.85, Elk Grove Fire Fee, all new development projects, including those in the LEA Community Plan Area, 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 a new fire station, acquire new equipment, and hire additional firefighters to maintain existing service ratios, if needed. In addition, the CCSD Fire Department receives additional funding through property taxes, fees for service, and grant funding and can, therefore, fund expanded services as new development occurs throughout the LEA Community Plan Area. These funds would help pay for services to support the new fire station and thereby alleviate strain on the City's existing fire service.

Additionally, the General Plan contains policies that, when implemented, would maintain adequate staffing, equipment, and facilities to provide timely and effective responses to emergencies (Policy IFP-1-10) and would require all discretionary development to provide, and existing development to maintain, adequate access for emergency vehicles. The General Plan encourages investment in facilities and infrastructure and services to ensure public safety and improve quality of life, and requires adequate emergency vehicle access in new discretionary development (Policy SAF-1-3; SAF-1-4). In addition, new housing units associated with the Project would be designed to comply with building and fire codes (EGMC Chapter 17.04) and include appropriate fire safety measures and equipment such as fire hydrants and sprinkler systems, smoke detectors, fire extinguishers, and adequate access and egress for emergency vehicles. Thus, the existing and planned fire stations would be sufficient to serve development related to the Project.

Portions of the LEA Community Plan Area have been previously analyzed in certified CEQA documents for the following projects: Southeast Policy Area Strategic Plan, Laguna Ridge Specific Plan, and Lent Ranch Marketplace Special Planning Area. Mitigation measures from the Laguna Ridge Specific Plan includes requirements related to fire protection and emergency services. A comprehensive list of mitigation measures from other community plans prior

environmental review are included in Appendix G. Mitigation measures from the Laguna Ridge Specific Plan EIR include requirements to meet minimum necessary fire flow, provide a permanent fire station, access to open space areas, and provide emergency vehicle turn arounds. Fire protection and emergency services requirements in Elk Grove General Plan policies, Elk Grove Municipal Code, CCSD Fire Department requirements, and LEA Form Based Code, as described above, contain the same performance standards and are equivalent in effectiveness as mitigation contained in prior environmental documents. Therefore, no additional mitigation is required in the LEA Community Plan Area for impacts to fire protection services.

Development of housing units within the LEA Community Plan Area associated with the Project would increase the number of residents in the City, which would increase demand for fire protection and emergency medical services. The LEA Community Plan Area is located within CCSD Fire Department's existing service area and would not require any changes to the department's service area boundary (CCSD 2022c). Therefore, implementation of the Project would not directly affect response times.

There is no new significant effect and the impact is not more severe than the impact identified in the General Plan EIR. Therefore, impacts related to the provision of fire services for the LEA Community Plan Area would remain **less than significant**.

General Plan Land Use Designation Amendments

Increased demand for fire protection and emergency medical services because of the increased population growth anticipated from proposed land use amendments within the Old Town Policy Area is included in the overall population growth associated with the Project. Additionally, the Old Town SPA is located within the CCSD Fire Department's existing service area and would not require any changes to the department's service area boundary. As discussed above under the LEA Community Plan, impacts to fire protection and emergency medical services would be reduced by compliance with the EGMC and existing General Plan policies. Impact would remain **less than significant**. There is no new significant effect and the impact is not more severe than the impact identified in the General Plan EIR.

Grant Line Road Precise Roadway Study

Development of Grant Line Road would not induce population growth and there would be no need for increased fire protection services. **No impact** would occur. There is no new significant effect and the impact is not more severe than the impact identified in the General Plan EIR.

South and West Study Areas

Increased demand for fire protection and emergency medical services as a result of the increased population growth anticipated under the South and West Study Areas is included in the overall population growth associated with the Project. Additionally, the South and West Study Areas are located within the CCSD Fire Department's existing service area and would not require any changes to the department's service area boundary. As discussed above under the LEA Community Plan, impacts to fire protection and emergency medical services would be reduced by compliance with the EGMC and existing General Plan policies. Impact would remain **less than significant**. There is no new significant effect and the impact is not more severe than the impact identified in the General Plan EIR.

Mitigation Measures

No additional mitigation is required for this impact beyond compliance with EGMC Chapters 16.85 and 17.04 and General Plan Policies ER-4-1, ER-4-2, SAF-1-3, and SAF-1-4.

Impact 3.8-2: Require Construction of New Law Enforcement Facilities, Resulting in Adverse Environmental Impacts

General Plan EIR Impact 5.11.1.2 indicated that police services operates out of a centralized facility at the City Hall complex and additional police services to accommodate development can be accomplished through additional personnel and equipment and no significant impacts would occur. Relative to the General Plan EIR, the Project would not result in new or substantially more severe impacts related to law enforcement. In addition, Elk Grove General Plan Policy SAF-1-1 directs regular monitoring and review of the level of police staffing provided in Elk Grove and ensures that sufficient staffing and resources are available to serve local needs. The addition of new officers and/or administrative staff would not require a new or expanded police facility because EGPD operations would continue within the centralized facility at the City Hall complex and additional police services to accommodate development can be accomplished through additional personnel and equipment. Therefore, impacts related to the provision of law enforcement would remain **less than significant**.

LEA Community Plan Area

Implementation of the Project would increase housing and density, including in the LEA Community Plan Area. The Project could result in an additional 1,851 dwelling units in the City Planning Area beyond what is currently anticipated at buildout under the General Plan. The additional units would result in a potential population increase of up to 5,979 (see Section 3.7 "Population and Housing"). EGPD's service boundaries are contiguous with the City limits (City of Elk Grove 2018). The LEA Community Plan Area is located within the EGPD's existing service area and would not require any changes to the department's service area boundary. EGPD's current officer-to-resident population ratio is 0.81 sworn police officers per 1,000 residents. The EGPD operates out of a centralized facility at the City Hall complex and additional police services to accommodate development can be accomplished through additional personnel and equipment. The main police service campus is growing to accommodate the need for more police department office and storage space.

The General Plan EIR anticipated urbanization of the LEA Community Plan Area and identified that implementation of the General Plan would result in less-than-significant impacts to law enforcement with implementation of General Plan Policy SAF-1-1 (Impact 5.11.2.1, City of Elk Grove 2018: 5.11-7). General Plan Policy SAF-1-1 directs regular monitoring and review of the level of police staffing provided in Elk Grove and ensures 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 City, as well as by ongoing payments of property taxes.

The fiscal impacts that a project may pose to a city is not an environmental impact. As discussed above, indirect development that may be constructed as a result of the Project within the LEA Community Plan Area would result in a potential need for additional Elk Grove police officers. The City collects a Capital Facilities Fee that provides fair share funding towards the construction of new police facilities and acquires new (not replacement) police equipment to serve growth. The City also requires new development to annex into Community Facilities District (CFD) 2003-2, Police Services, which provides funding for various public safety services. In 2022, Elk Grove voters approved Measure E, a 1-cent general sales tax measures. Initial priorities for Measure E revenues may include, among other things, public safety. There is no new significant effect, and the impact is not more severe than the impact identified in the existing General Plan EIR. Therefore, impacts related to expanded police services and facilities for the LEA Community Plan Area would remain **less than significant**.

General Plan Land Use Designation Amendments

Increased demand for new law enforcement facilities because of the increased population growth anticipated from proposed land use amendments within the Old Town Policy Area is included in the overall population growth associated with the Project. Additionally, the Old Town Policy Area is located within the EGPD's existing service area and would not require any changes to the department's service area boundary. As discussed above under the LEA Community Plan, impacts to law enforcement facilities would be reduced by compliance with the EGMC and existing General Plan policies. Impact would remain **less than significant**. There is no new significant effect and the impact is not more severe than the impact identified in the General Plan EIR.

Grant Line Road Precise Roadway Study

Development of Grant Line Road would not induce population growth and there would be no need for increased police protection services. **No impact** would occur. There is no new significant effect and the impact is not more severe than the impact identified in the General Plan EIR.

South and West Study Areas

Increased demand for new law enforcement facilities as a result of the increased population growth anticipated under the South and West Study Areas is included in the overall population growth associated with the Project. Contrary to the LEA Community Plan Area and the Old Town SPA, the South and West Study Areas are located outside of the EGPD's existing service area. However, the South and West Study Areas would be subject to General Plan policies and mitigation measures identified in the General Plan EIR to reduce physical environmental effects and provide additional police protection services as the study areas develop. Impact would remain **less than significant**. There is no new significant effect and the impact is not more severe than the impact identified in the General Plan EIR.

Mitigation Measures

No mitigation is required for this impact beyond compliance with General Plan Policy SAF-1-1.

Impact 3.8-3: Increased Demand for New Public School Facilities

Impact 5.11.3.1 of the General Plan EIR identifies that future development in the City would result in an increase of school-aged children and would require the construction of new public school facilities. As determined by the General Plan EIR, because school facilities would be constructed by the EGUSD the environmental impacts of school construction would be significant and unavoidable. Implementation of the Project would result in an increase in student generation that could require additional school facility needs beyond current General Plan analysis. This would be an increase in impact severity than what was previously identified in General Plan EIR Impact 5.11.3.1. No mitigation measures are available to reduce potentially significant impacts; thus this impact would remain **significant and unavoidable**.

LEA Community Plan Area

As stated previously, implementation of the Project would result in an increase of housing and density throughout the City, including in the LEA Community Plan Area. Overall, the Project could increase the number of dwelling units in the City up to 1,851 units beyond those identified in the current General Plan. This increase of 1,851 net new housing units would result in a potential population increase in the City of up to 5,979 persons when compared to the adopted General Plan (see Section 3.7 "Population and Housing").

With the anticipated development under the Project, there would be an increase in the number of school-aged children that would reside in the City, triggering the need for additional public school facilities. Table 3.8-1 summarizes the EGUSD student generation rates from the School Facility Needs Analysis (EGUSD 2021b).

Table 3.8-1 Potential New Students

Grade Level	Proposed Student Generation Rate	Maximum Potential of Additional Units Beyond Existing General Plan Buildout	New Students
Elementary K-6	0.2415	1,851	447
Middle School 7-8	0.0616		114
High School 9-12	0.1091		202
Total		1,851	763

Calculated by Ascent Environmental in 2022.

Based on the existing student generation factors, the Project could result in an additional 763 students to be enrolled at EGUSD schools beyond what was evaluated in the General Plan EIR. This increase in enrollment would require the construction of one new elementary school; however the need for an additional middle school or high school would not be necessary because there is sufficient capacity to serve additional students. EGUSD has disclosed that the first

annexation project would trigger the need for a new middle school and high school, which may be located south of Kammerer Road. Although, some of the units located within the LEA Community Plan Area within the existing City limits would be accommodated on an interim basis. Anticipated growth under the Project would be in addition to the projected student enrollment, which was developed before adoption of the General Plan. Thus, growth associated with the General Plan and the Project was not factored into EGUSD planning and new or expanded public school facilities will be necessary. It is important to note that residential units associated with the Project would be distributed throughout the LEA Community Planning Area, Old Town Policy Area, and the South and West Study Areas. Depending on the rate of development and the location, the specific need for each school type will vary. For instance, revisions to school assignment boundaries, implemented at the discretion of the district, may be used to accommodate increased growth in some situations. The LEA Community Plan has identified one elementary school site located immediately north of Kammerer Road east of Big Horn Boulevard, which would support proposed elementary school population growth in the area north of Kammerer Road.

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 EGUSD's boundaries 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.

Public Resources Code (PRC) Section 21151.2 requires school district governing boards to give the relevant planning commission a written notice in writing of the proposed acquisition before acquiring title to property for a new school site or for an addition to an existing school site. The planning commission is responsible for investigating the proposed site and providing it, and any related recommendations, to the governing board. In addition, Government Code Section 65402 requires a school district, prior to acquiring real property, to submit the location, purpose, and extent of such acquisition to the City Council for a determination as to conformity with the local General Plan. A school district, with a two-thirds vote, may render a city zoning ordinance inapplicable to classroom facilities, except when the proposed use of the property by the school district is for non-classroom facilities. Before a school district can override a local zoning ordinance, it must first comply with expanded coordination and communication requirements. The district also must comply with pre-existing CEQA requirements regarding school site review before overriding local zoning (Government Code Sections 53094, 65352.2).

Construction or expansion of public school facilities to accommodate population growth within the LEA Community Plan Area 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 that are greater than previously considered in the General Plan EIR. 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 for subsequent projects. The physical impacts of facility construction for the Project are discussed throughout the General Plan EIR. Because no additional feasible mitigation is available beyond compliance with existing laws and General Plan policies, and payment of EGUSD fees, the impact would remain **significant and unavoidable**.

General Plan Land Use Designation Amendments

Increased demand for new or expanded public school facilities as a result of the increased population growth anticipated from proposed land use amendments within the Old Town Policy Area is included in the overall population growth associated with the Project. The Old Town Policy Area is located within the existing EGUSD Service Area boundary (EGUSD 2022b). However, as discussed above under the LEA Community Plan, construction or expansion of public school facilities to accommodate population growth as a result of the Project may be required, and would be under the jurisdiction of the EGUSD. This impact would remain **significant and unavoidable**.

Grant Line Road Precise Roadway Study

Development of Grant Line Road would not induce population growth, including the number of students. **No impact** would occur.

South and West Study Areas

Increased demand for new or expanded public school facilities as a result of the increased population growth anticipated under the South and West Study Areas are included in the overall population growth associated with the Project. The South and West Study Areas are located within the existing EGUSD Service Area boundary (EGUSD 2022b). However, as discussed above under the LEA Community Plan, construction or expansion of public school facilities to accommodate population growth as a result of the Project may be required, and would be under the jurisdiction of the EGUSD. Nonetheless, because school facilities would be constructed by the EGUSD this impact would remain **significant and unavoidable**.

Mitigation Measures

As stated in the General Plan EIR, no additional feasible mitigation is available beyond compliance with existing laws and General Plan policies, and payment of EGUSD fees. 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 new enforceable measures are available to the City to mitigate this impact. Therefore, this impact would remain **significant and unavoidable** for the Project as determined in the General Plan EIR.

Impact 3.8-4: Require Construction of New Park or Recreation Facilities, resulting in Adverse Environmental Impacts

Impact 5.11.4.1 of the General Plan EIR identifies that increased development would increase the demand on existing recreational facilities and require the development of new recreational facilities and no significant impacts would occur. Construction of park facilities would be subject to policies, standards, and mitigation measures from the General Plan and the General Plan EIR, or the mitigation identified in project-specific mitigation monitoring and reporting programs. No new or substantially more severe impacts would be associated with implementation of the Project. The impacts of park construction would remain **less than significant**.

LEA Community Plan Area

Implementation of the Project would include additional housing in the LEA Community Plan Area beyond what is currently allowed under the General Plan. This could result in an additional 1,851 dwelling units and a net increase of 5,979 in City population beyond what is currently anticipated at buildout under the General Plan. As a result of proposed population growth and new employment opportunities in the LEA Community Plan Area, both new residents and employees could increase the use of park facilities. CCSD parkland standards, EGMC Chapters 22.40 and 16.80, and General Plan Policy PT-1-3 require a minimum of 5 acres of developed parkland per 1,000 residents. The City has also established requirements for bicycle, pedestrian, and trail facilities as part of new development, either through the City's Bicycle, Pedestrian, and Trails Master Plan, or through the requirements of an area plan; though, these facilities are in addition to the required park facilities. The City requires that private developers proposing residential projects in the City, including the LEA Community Plan Area, either dedicate land for park facilities or pay a fee in lieu of providing parkland. These dedications and fees are collected by the City or CCSD as part of the development process and used for the purpose of developing new park facilities to serve the development for which the fees were paid. The dedication of parkland and the payment of fees in lieu of dedication were identified in Impact 5.11.4.1 of the General Plan EIR.

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 within the LEA Community Plan Area and requires developers to incorporate open space where appropriate as a condition of approval. Policy PT-1-7 prioritizes 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-1-9 encourages park development adjacent to school sites to allow for concurrent use of the facilities when appropriate. The proposed Project also includes Goal LEA-5 and associated policies, which address development of parks and open spaces within the LEA Community Plan.

As part of the CCSD's Parks and Recreation Master Plan update, the City and the CCSD jointly adopted amendments to the Park Design Principles, which established 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 was coordinated with the General Plan and describe the service area and design objectives for new parks and recreation facilities in the community.

Any future development located in the LEA Community Plan Area that is constructed under the 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 General Plan, would ensure that impacts related to deterioration of existing parks and recreation facilities would not occur. Although development impact fees are required to ensure a minimum acreage of parkland within the City, including the LEA Community Plan Area, these fees apply to subdivisions and not individual units. Although, as illustrated in Figure 2-2, there are several areas located throughout the LEA Community Plan Area that are designated as Parks and Open Space (P/OS), which would serve proposed development as a result of the Project.

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 General Plan policies and mitigation measures identified in the General Plan 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.

There are no new significant physical effects to parks and recreational facilities and the impact is not more severe than the impact identified in the General Plan EIR. Therefore, impacts related to the provision of park and recreational facilities located within the LEA Community Plan Area would remain **less than significant**.

General Plan Land Use Designation Amendments

Increased demand for new parks or recreational facilities because of the increased population growth anticipated from proposed land use amendments within the Old Town Policy Area is included in the overall population growth associated with the Project. Additionally, the Old Town Policy Area is located within the existing CCSD Parks & Recreation Service Area (CCSD Parks and Recreation Department 2018). However, as discussed above under the LEA Community Plan, construction or expansion of park facilities to accommodate population growth as a result of the Project may be required. Because development in the Old Town would be required to comply with the City and CCSD fee programs specific to park development, impacts would remain **less than significant**. There is no new significant effect and the impact is not more severe than the impact identified in the General Plan EIR.

Grant Line Road Precise Roadway Study

Development of the Grant Line Road would not induce population growth that would create additional park and recreation demand. **No impact** would occur. There is no new significant effect and the impact is not more severe than the impact identified in the General Plan EIR.

South and West Study Areas

Increased demand for new parks or recreational facilities because of the increased population growth anticipated under the South and West Study Areas is included in the overall population growth associated with the Project. Additionally, the South and West Study Areas are located within the existing CCSD Parks & Recreation Service Area (CCSD Parks and Recreation Department 2018). However, as discussed above under the LEA Community Plan, construction or expansion of park facilities to accommodate population grown as a result of the Project may be required. Once annexed, the South and West Study Areas would be required to comply with City's and CCSD's fee programs specific to park development. As discussed above in Section 3.8.1, development in the City is required to meet its Quimby obligation (park land dedication or in-lieu fee) pursuant to EGMC Chapters 22.40 and 16.80 and

would also be responsible for paying applicable park development fees and trail improvement fees (e.g., area fees, Citywide Active Transportation Fee). Additionally, parkland requirements established in Policy PT-1-3, PT-1-5, PT-1-7, and PT-1-9 discussed above, would further reduce impacts to parks and recreational facilities. As a result, the impact would remain **less than significant**. There is no new significant effect and the impact is not more severe than the impact identified in the General Plan EIR.

Mitigation Measures

No mitigation is required for this impact beyond compliance with General Plan Policies PT-1-3, PT-1-5, PT-1-6, and PT-1-9, City and CCSD MOU, and EGMC Chapter 22.40.