

### 3.11 PUBLIC SERVICES

The following section describes existing and planned public services, and evaluates the operation and capacity of these services with the development of the Project. Public services utilized during construction and operation of the Project include police and fire protection, schools, and parks. The following agencies provide public services for the Project site:

**Table 3.11-1. Public Services Serving the Project Vicinity**

Public Services Serving Avila Ranch	
<b>Fire Protection</b>	City of San Luis Obispo Fire Department
<b>Law Enforcement</b>	City of San Luis Obispo Police Department
<b>Public Schools</b>	San Luis Coastal Unified School District
<b>Public Parks</b>	City of San Luis Obispo Department of Parks and Recreation

For information regarding public utilities such as water, wastewater, solid waste, and energy utilities, please refer to Section 3.13, *Utilities*, and for public transportation and parking, please refer to Section 3.12, *Transportation and Traffic*.

Development of the Project site with residential and commercial uses would increase demand on City of San Luis Obispo (City) services, including fire protection, police protection, and other City supported public services; however, the City has a system of developer impact fees and required dedications or exactions established to address direct demand for new facilities (e.g., park land), while potential increases in property tax revenue associated with valuation of new homes, businesses, and other revenues (e.g., sales tax) would help offset the increased ongoing cost of provision of public services to new residents and commercial uses.

Information in this section was derived from the 2014 Land Use and Circulation Elements Update EIR (LUCE Update EIR), as well as contacts with the San Luis Obispo Police Department (SLOPD), San Luis Obispo City Fire Department (SLOFD), California Department of Forestry and Fire Protection (CALFIRE), and the San Luis Coastal Unified School District (SLCUSD).

#### 3.11.1 LUCE Update EIR

The LUCE Update EIR analyzed the impacts of increased demand for public services associated with development of the Project site related to the adoption of land use designations in the 2014 LUCE Update. The LUCE Update EIR noted that the Project site

is located beyond the City Fire Department's 4-minute travel time area and recommended adding a fifth fire station to improve response time in southern areas of the City in order to address potential fire safety impacts. The LUCE Update EIR concluded that increased demand for police services resulting from additional population associated with buildout allowed under the LUCE Update would not require expanded law enforcement facilities that would have the potential to result in significant environmental impacts.

With regard to schools, the LUCE Update EIR found that while generation of additional school-age children from total LUCE buildout could potentially contribute to over-capacity conditions of local schools and the need for facilities expansion, it is unlikely that the expansions would result in significant adverse environmental impacts.

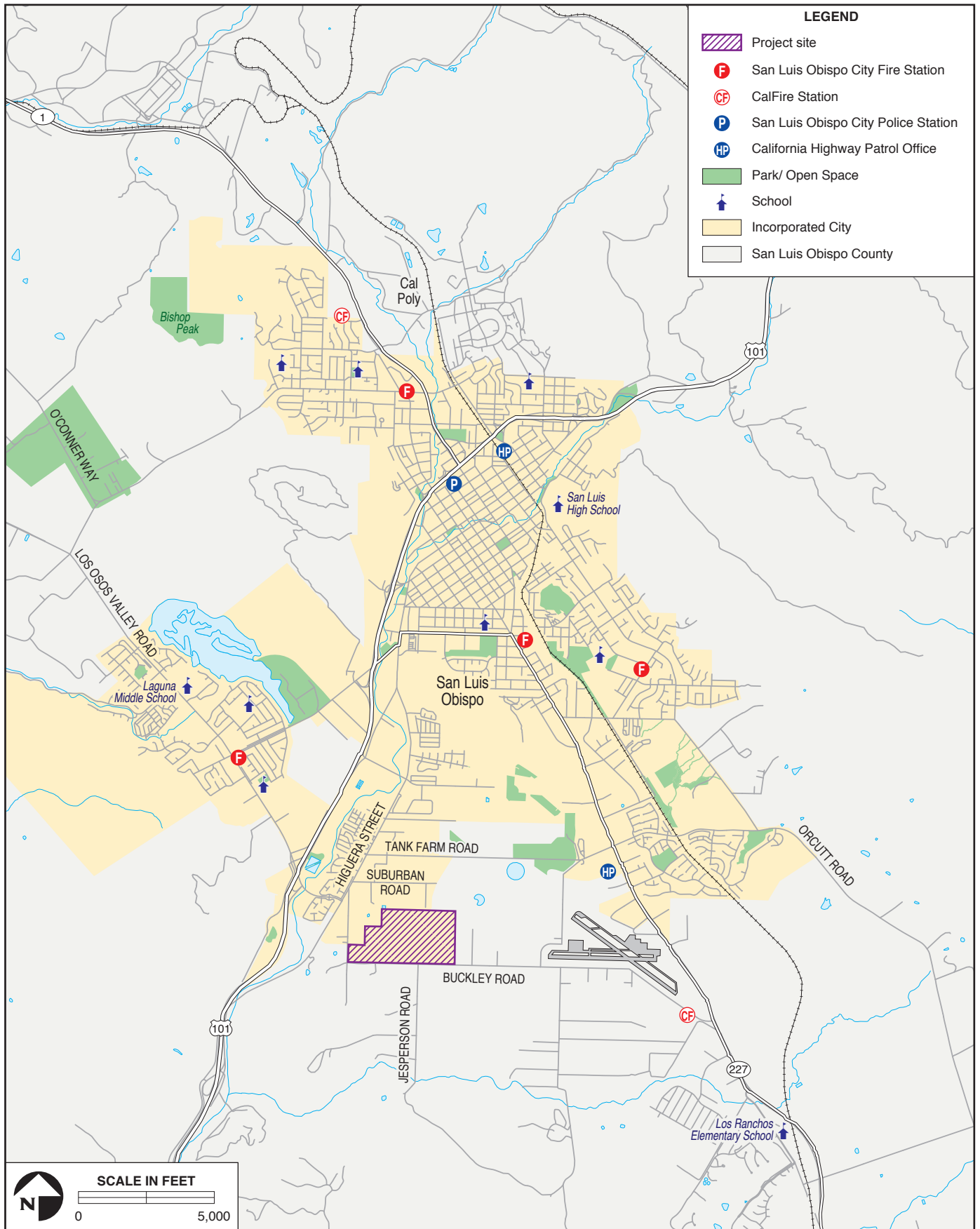
The LUCE Update EIR parks and recreation analysis determined that although the City's existing per capita parkland standard is not currently achieved, the LUCE buildout would provide additional acres of parkland within the City and a slightly improved parkland per capita ratio when compared to existing conditions. On a Citywide basis, the LUCE buildout would result in an increase in the existing per capita parkland area and, therefore, less than significant environmental impacts related to parks and recreation facilities.

#### **3.11.2 Environmental Setting**

Figure 3.11-1 shows the key existing public facilities operated by the City, which are located in the vicinity of the Project.

##### **3.11.1.1 Police Services**

The San Luis Obispo Police Department (SLOPD) provides a variety of law enforcement and community services. The City operates out of one main police station which is located at 1042 Walnut Street at the intersection of Santa Rosa (Highway 1) and U.S. Highway 101. The building was constructed in 1969 and is currently at full occupancy and in need of rehabilitation and growth. Full-time Police Department staff includes 85.5 employees, 60 of whom are sworn police officers who provide law enforcement, supervision, and management duties. The SLOPD is divided into two police bureaus, with a Police Captain commanding each. The Operations Bureau includes Patrol Services, Traffic Safety, Downtown bike officers, homeless services through a Community Action Team, Special Enforcement Team, and Neighborhood Services, while the Administration Bureau includes Administrative Services, Investigative Division, Communications Division, and the Records Unit (SLOPD 2015).



According to the Safety Element of the City's General Plan, the SLOPD has a 30 percent available-time objective for patrol response and the current ratio of officers to 1,000 people in the City is 1.27 (City of San Luis Obispo 2014b). Available time is the portion of total time that a patrol unit is not previously assigned or otherwise unavailable for response to a new emergency call for service. Potential changes in needs for the SLOPD staffing plan are considered as part of overall City budget priorities. Additionally, equipment enhancement programs exist and are also considered in the context of the City budget process and available grants.

In 2015, police officers took 31,924 calls for service (CFS) with a permanent population of 45,950 and a daily service population of approximately 90,000. A 5-year average of CFS and permanent population equates to each resident requiring a CFS at a rate of 0.67 CFS per resident per year. One officer takes on an average of 925 calls per year. Each increase of 1,400 permanent residents would require an addition of one officer, not including investigations personnel, communications, records, property, or admin staff. Additionally, approximately 15 percent of police officer shift time is spent in the Downtown area, and CFS that are outside of that area will naturally increase response times. Any increase in population in the City will have a negative impact on police services (City of San Luis Obispo, comm. with Keith Storton 2016).

#### 3.11.1.2 Fire Protection Services

The Project site is located in a Moderate Fire Severity Zone. Moderate wildfire hazards within the Project area are associated with open grasslands and scattered trees, but not highly flammable chaparral habitats. The site is currently undeveloped and has been historically used for cultivated agriculture and pasture to support grazing. Much of the Project site is typically plowed to facilitate cultivation, minimizing vegetative growth. Tank Farm Creek traverses the site diagonally from the northeast to southwest and supports a riparian corridor of approximately 10 to up to 100 feet in width. The lack of dense brush, presence of a moist riparian corridor factors, and frequent cultivation all reduce existing onsite wildfire hazards.

San Luis Obispo City Fire Department (SLOFD) provides emergency and non-emergency fire, rescue, and medical services, with support from CALFIRE through mutual aid agreements, as described below. Emergency services include fire response, advanced life support ("paramedic") emergency medical response, hazardous materials response, technical rescue response, and public assistance. All City engine companies include paramedic staff and equipment capabilities. Non-emergency services include fire and life

safety inspections, building inspections, fire code investigations, code compliance, and public education. The SLOFD currently operates four fire stations with a total of 54 full-time employees. Four of these employees are administrative personnel, two are vehicle and equipment mechanics, six are fire prevention and educational staff, and the remaining 42 are firefighters with emergency response capabilities (SLOFD 2015a).

Fire Station One: Constructed in 1996, this station is located south of Downtown at 2160 Santa Barbara Avenue. This is the newest firehouse in the City and it houses the Fire Administrative staff, the Fire Prevention Bureau, the department's apparatus maintenance shop, the City's Emergency Operations Center, as well as emergency response personnel and apparatus. On the emergency response side, this station is staffed by a Battalion Chief and a four-person paramedic company which responds on a 100-foot tillered quint ladder truck. Also housed at this station is a Type VI wildland response vehicle (Patrol 1), a non-transport medical response unit (Squad 1), and the reserve ladder truck (a 1993 75-foot Quint).

Fire Station Two: Constructed in 1954, this station is located near the California Polytechnic State University (Cal Poly) campus at 126 North Chorro Street. This is the oldest station in the City and it is staffed with a three-person paramedic engine company (Type I pumper/fire engine). Additional equipment housed at Fire Station 2 includes a state-owned Type I pumper/fire engine and a four-wheel-drive pickup truck for Open Space rescue support.

Fire Station Three: Constructed in 1960, this station is located at 1280 Laurel Lane and is the only fire station on the east side of the Southern Pacific Railroad line. The station is staffed with a three-person paramedic engine company (Type I pumper/fire engine). Additional equipment housed at Fire Station 3 includes the reserve Type I pumper/fire engine.

Fire Station Four: Constructed in 1978, this station is the western-most station and is located in the area of Laguna Lake at 1395 Madonna Road and is the closest station to the Project site. The station is staffed with a three-person paramedic engine company (Type I pumper/fire engine). Additional equipment housed at Fire Station 4 includes an unstaffed Type III fire apparatus.



*Fire Station Four is located at 1395 Madonna Road and is the closest station to the Project site.*

#### Existing SLOFD Response Times

According to the City of San Luis Obispo's General Plan Safety Element, sufficient Fire Department resources should be deployed to facilitate a travel time of emergency response apparatus to all City emergencies requiring the use of lights and siren of 4 minutes or less, 95 percent of the time. In 2016, the City Council directed staff to adopt the more recognized standard of a travel time of 4 minutes or less 90 percent of the time. Fire Station Four is located at 1395 Madonna Road, approximately 2 miles west of the Project site. According to the City Geographic Information System (GIS) analysis, the response time for emergencies to the Project site are outside of the General Plan Safety Element minimum travel time goal of 4 minutes or less of travel time (SLOFD 2015b).

The lack of 4-minute response time coverage in the southern portion of the City was identified in the 2009 Fire Department Master Plan and the LUCE Update EIR, which both recommended adding a fifth fire station and crew to improve response time in southern areas of the City (City of San Luis Obispo 2014a; SLOFD 2009). In addition, existing City department daily firefighter staffing is not adequate as an initial force to extinguish serious fires without help from CALFIRE. The Fire Department Master Plan determined that each shift for SLOFD would require a minimum of 14 personnel on duty at any given time; however, in order to adequately address calls for service, daily staffing would need to be increased to 16 personnel per day. The Fire Department Master Plan finds that the addition of a fifth fire station in the southern area of the City would address this need for additional firefighting personnel to address a major event. The Fire Department Master Plan determined that increasing firefighter staffing at existing City fire stations alone would not improve response times in the Project area nor allow simultaneous emergency calls to be covered by a proposed fifth unit in the event a CALFIRE unit is not available (SLOFD 2009).

The City does not currently have an established development impact fee program to fund development of new fire department facilities. However, the City is currently in the process to consider establishing an impact fee program to fund a fifth SLOFD fire station to serve the southern portion of the City (SLOFD 2015c). While the City is currently undergoing this process, the timing for adoption of the new fee program has not been determined and the timing of actual fire station site acquisition and development cannot be accurately forecasted (SLOFD 2015c).

Mutual Aid Agreements between SLOFD and CALFIRE

In California, virtually all fire departments are signatories to the California Master Mutual Aid Agreement. SLOFD has current interagency plans in partnership with CALFIRE and is a participant in the California Master Mutual Aid Agreement within Mutual Aid Region 1. The California Master Mutual Aid Agreement establishes a formal process where jurisdictions can give and receive fire or emergency assistance to other members within their mutual aid region when it is needed. CALFIRE Fire Station 21 would be the jurisdictional station to provide responses for the Project site. Fire Station 21 is located approximated 3.5 miles to the east and would have a 6- to 8-minute response time to the Project site (CALFIRE 2016a).

CALFIRE Fire Station 21: This station is located at San Luis Obispo Regional Airport on 4671 Broad Street and is one of the newest fire service facilities located in San Luis Obispo County (County). This fire station is staffed with a two-person basic life support engine company and a single-person airport crash rescue truck. This station does not provide advanced life support (paramedic) services. This station provides other reserve and non-staffed apparatus. The station is also staffed by a Paid Call Fire Company (non-full time) to service the rescue and water tender (CALFIRE 2016b).

3.11.1.3 Schools

The San Luis Coastal Unified School District (SLCUSD) provides educational services for the City, the City of Morro Bay, and a portion of the unincorporated areas of the County. The SLCUSD operates a variety of educational programs and schools, which include 10 elementary schools, 2 middle schools, 2 high schools, 1 continuation school, and 1 adult school (SLCUSD 2015a). The closest schools to the Project site are Los Ranchos Elementary School (3.5 miles southeast), Laguna Middle School (3.4 miles northwest), and San Luis High School (4.6 miles north). Table 3.11-2 summarizes existing capacity and enrollment at SLCUSD schools from the 2014 to 2015 school year.

**Table 3.11-2. Existing Capacity and Enrollment at SLCUSD Schools (2014-2015)**

School	Capacity	Enrollment	% Utilization <sup>1</sup>	Remaining Capacity
<i>Elementary</i>				
Baywood Elementary	432	352	81	<u>80</u>
Bellevue-Santa Fe Charter	154	154	100	<u>0</u>
Bishop's Peak/Teach Elementary	542	427	79	<u>115</u>
Del Mar Elementary	477	443	93	<u>34</u>
Hawthorne Elementary	390	310	79	<u>80</u>
Los Ranchos Elementary	460	463	101	<u>-3</u>
Monarch Grove Elementary	470	347	74	<u>123</u>
Pacheco Elementary	528	541	102	<u>-13</u>
Sinsheimer Elementary	467	359	77	<u>108</u>
C.L. Smith Elementary	452	418	92	<u>34</u>
<b>Total</b>	<b>4,624 4,372</b>	<b>3,996 3,814</b>	<b>86 87</b>	<b>558</b>
<i>Middle School</i>				
Laguna Middle School	1,118	688	62	<u>430</u>
Los Osos Middle School	1,073	583	54	<u>490</u>
<b>Total</b>	<b>2,191</b>	<b>1,271</b>	<b>58</b>	<b>920</b>
<i>High School</i>				
San Luis High School	2,034	1,431	70	<u>603</u>
Morro Bay High School	1,400	867	62	<u>533</u>
<b>Total</b>	<b>3,574 3,434</b>	<b>2,362 2,298</b>	<b>66 67</b>	<b>1,136</b>

<sup>1</sup> For elementary schools at or above 90 percent capacity – In 2014/2015, SLCUSD did not load three or more classrooms at each elementary school site due to enhanced programs. Therefore, if additional capacity were needed, these programs could potentially be moved to different spaces (with the exception of Bellevue-Santa Fe Charter which will remain at 100 percent due to programming).

Source: SLCUSD 2015b.

SLCUSD currently provides intra-district open enrollment, which allows parents a request to enroll their children at any district school; the district approves requests on a space-available basis. The ideal utilization of an elementary school site is 90 percent, and 85 percent for a middle school site (SLCUSD 2015b). According to the SLCUSD Enrollment Projections Capacity Analysis 2014/15 Update, the majority of these schools currently have the capacity to accept additional students; however, three elementary schools are operating either at or over capacity, including Los Ranchos Elementary, the closest elementary school to the Project site (see Table 3.11-2; SLCUSD 2015b).



#### 3.11.1.4 Parks

The San Luis Obispo Parks and Recreation Department is responsible for providing the community with park facilities, recreational programs, planning new park facilities, and managing City open space that is accessible to the public. There are 21 parks and sports facilities located throughout the City in addition to 10 designated Natural Reserves and open spaces (City of San Luis Obispo 2015a). There are three parks located in the general Project vicinity, including Islay Hill Park (3.1 miles northeast), Las Praderas Park (1.5 miles northwest), and French Park (2.6 miles northeast) (City of San Luis Obispo 2012). In addition, the Johnson Ranch and Irish Hills Natural Reserve open space areas and associated hiking trails lie approximately 1.5 miles west of the Project site across U.S. Highway 101.



*Islay Hill Park is located 3.1 miles northeast of the Project site and provides passive recreation opportunities (i.e., trails).*

The City General Plan, Parks and Recreation Element, Policy 3.13.1 requires that neighborhood and community park facilities be provided at a ratio of 10 acres of parkland per 1,000 persons in expansion areas, of which, 5 acres should be neighborhood parks. Under existing conditions, the City Parks Department maintains a total of 151.65 acres of parks, landscape areas, and open spaces, of which 33.53 acres are neighborhood parks. This results in approximately 3.32 acres of total parkland per 1,000 residents, and 0.72 acres of neighborhood parks per 1,000 residents. Based on existing population and parks acreage conditions, the City needs an additional 303 acres of park land to serve existing residents, of which 195 acres should be neighborhood parks, to meet its per capita parkland standard (City of San Luis Obispo 2012).

### 3.11.3 Regulatory Setting

#### 3.11.3.1 Federal

No federal public service regulations or policies would be applicable to the Project.

3.11.3.2 State

California Code of Regulations Sections 17620 and 65995

California Code of Regulations (CCR) Section 17620 authorizes school districts to levy a fee, charge, dedication, or other requirement against any construction of new residential, commercial, and industrial uses within their boundaries to fund the construction of new schools or school facilities. CCR Section 65995 limits the maximum fee that school districts can assess. Section 65996 designates Section 17620 of the Education Code and Section 65970 of the Government Code to be the exclusive method for considering and mitigating development impacts on school facilities.

Senate Bill 50 (SB 50) (1998)

This bill requires that cities and counties mitigate impacts to school facilities as a condition of approving new developments. SB 50 also authorizes school districts to levy statutory developer fees at levels which may be significantly higher than previously permitted. To levy fees higher than permitted, the school district must conduct a Needs Analysis and a Fee Justification Study which address the justification of the levying of developer fees. This legislation also stipulates that school impact fees are the sole and exclusive method of mitigation for school enrollment impacts.

Quimby Act (1975)

The Quimby Act gives cities and counties the authority, by ordinance, to require the dedication of land or payment of in-lieu fees, or a combination of both, for park and recreation purposes as a condition of approval of a tract map or parcel map. The Quimby Act allows fees to be collected for up to 5 acres of parkland per 1,000 residents to serve the needs of residents of the subdivision and the greater public residing in the City.

3.11.3.3 Local

City of San Luis Obispo General Plan

The City of San Luis Obispo is the provider of emergency protection services to residents of the City. Applicable regulations that would affect the provision of public services are based on local policies and other regulations that place requirements on the level of service that must be provided. Established policies and regulations that would apply to the Project are contained in the plans and policies section of the following General Plan Elements.

*Parks and Recreation Element*

**Policy 3.13.1. The Parks System.** The City shall develop and maintain a park system at a rate of 10 acres of parkland per 1,000 residents. Five acres shall be dedicated as a neighborhood park. The remaining five acres required under the 10 acres per 1,000 residents in the residential annexation policy may be located anywhere within the City’s park system as deemed appropriate.

**Policy 3.15.1 Neighborhood Parks.** San Luis Obispo residents shall have access to a neighborhood park within 0.5 to 1.0 mile walking distance of their residence.

**Policy 3.15.3 Neighborhood Parks.** All residential annexation areas shall provide developed neighborhood parks at the rate of five acres per 1,000 residents.

**Policy 3.15.4 Neighborhood Parks.** In neighborhoods where existing parks do not adequately serve residents, mini-parks may be considered.

*Safety Element*

**Policy 3.0 Adequate Fire Service.** Development shall be approved only when adequate fire suppression services and facilities are available or will be made available concurrent with development, considering the setting, type, intensity, and form of the proposed development.

**Policy 9.3 Program: Response Performance Standards.** The following response-time programs are intended to apply to recurrent types of emergencies, not rare, area-wide disasters.

- a) The Fire Department has set a response-time objective of four minutes. (The Fire Department’s standard of coverage recommends that a three-person engine company, with paramedic, meet this standard 95 percent of the time.)
- b) The Police Department has set a 30-percent available-time objective for patrol response. (“Available time” is the fraction of total time that a patrol unit is not previously assigned or otherwise unavailable for response to a new emergency call for service.)
- c) The City will evaluate fire-flow capacities and identify deficiencies through testing and modeling of the water system. For identified deficiencies, the Utilities Department will propose remedies to meet recommended service levels based on Insurance Service Organization ratings and other objective criteria.

**Policy 9.21 Program: Development Review.** City fire, police, public works, and utilities personnel will review applications for subdivisions and development projects, for consistency with safety objectives.

#### Airport Area Specific Plan

**Policy 7.9.1 Adequate Fire Suppression Services and Facilities.** The City shall provide adequate fire suppression services and facilities to the Airport Area, consistent with the Safety Element of the General Plan, by completing area transportation improvements, co-locating City fire services with existing CALFIRE facilities located on Broad Street, and/or establishing a permanent facility within the Airport Area.

**Policy 7.9.2 Fire Station Location and Site Dedication.** During the first phase of development of the Chevron Tank Farm site, property that is suitable for the development of a new fire station shall be deeded to the City, to the approval of the Fire Chief.

**Policy 7.9.3 Interim Safety Improvements.** Until a permanent facility is developed that enables the City to achieve its response time objectives, new development in the Airport Area may be required to finance other improvements that will contribute to alleviating current deficiencies, as identified in the San Luis Obispo Fire Department Master Plan (2009). This policy will be implemented on a case by case basis through conditions of approval when project specific fire and life safety impacts are identified.

### **3.11.4 Environmental Impact Analysis**

#### 3.11.4.1 Thresholds of Significance

The thresholds of significance listed below are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines, as well as the General Plan Safety Element, AASP, and SLOFD guidelines for response times. The effects of the Project on public services would be considered a significant impact if:

- a) Police protection services to the Project site were inadequate, police staffing would be inadequate to support the Project or if the Project demand for such services would indirectly affect existing levels of such services for City residents;
- b) Fire protection services response times to the Project site did not meet established requirements (e.g. less than 4 minutes), or if the firefighter/population ratio would decline for existing residents, or if firefighter staffing or equipment would be inadequate to support the Project;

- c) The Project increased demand for schools and park services beyond current capacity, with potential impacts to the adequacy of services to existing City and future Project residents;
- d) Substantial adverse physical impacts would occur associated with provision of new or physically altered governmental facilities; or
- e) The Project would create 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.

#### 3.11.4.2 Impact Assessment Methodology

This section evaluates the adequacy of existing police and fire protection services, public schools, and parklands to serve the Project, including any planned improvements to these services. The analysis identifies Project created increases in demand for such services, the adequacy of existing and planned services or facilities to meet such demand and the possible indirect effects on existing residents of such increases in demand. Finally, this section reviews whether Project increases in demand for such services would create a need for new or physically altered facilities, the construction of which could cause significant environmental impacts.

In order to assess impacts on public service systems, existing and forecast capacities of service providers were obtained from SLCUSD, SLOFD and SLOPD management personnel and General Plan documents. Project increases in population were assessed to identify increased demand for public services. The goals and policies of the City's General Plan, Safety Element and Parks and Recreation Elements, as well as those in the AASP, provided additional information used to establish levels of significance for public services. SLOFD and SLOPD also provided guidelines for determining potential impacts to police and fire protection services, specifically staffing and service demands.

#### 3.11.4.3 Project Impacts and Mitigation Measures

The proposed Project would result in the following public services impacts.

**Table 3.11-3. Summary of Project Impacts**

Public Service Impacts	Mitigation Measures	Residual Significance
PS-1 Implementation of the Project would potentially increase demand on the SLOPD for police protection services.	MM PS-1	Significant but Mitigable
PS-2 Project implementation would increase the demand for SLOFD fire protection services, create potential declines in firefighter to resident ratios, be located outside of accepted response time performance area and necessitate construction of an additional fire protection facility, with potential for secondary environmental impacts.	MM PS-2	Significant but Mitigable
PS-3 Development of 720 new homes as part of the Project would generate increases in enrollment at public schools (Los Ranchos Elementary, Laguna Middle, and San Luis High).	None required	Less than Significant
PS-4 Implementation of the Project would potentially increase the demand for <del>park</del> <u>public parks</u> beyond current capacity.	None required	Less than Significant

**Impact PS-1 Implementation of the Project would potentially increase demand on the SLOPD for police protection services (Significant but Mitigable).**

The Project would result in development of 720 multiple and single family homes, 15,000 sf of commercial space concentrated in the Town Center, and 71.30 acres of open space and parks. At full buildout, the Project site would support a population of 1,649 residents as well as patrons or users of the 15,000 sf of commercial space. New residential and non-residential development as part of the Project would increase City population by approximately 3.5 percent, incrementally increasing demand for SLOPD police protection services and responses to incidents such as burglary, domestic or neighborhood disputes, traffic violations, noise complaints and other similar incidents. Because the Project would be implemented in six phases over approximately 10 years, increases in call volumes for SLOPD services would occur incrementally over time. Without additional resources, such increases in call volumes could incrementally affect levels of service to both future Project residents and existing City residents.

Existing SLOPD staff levels are adequate to meet the City’s Safety Element standard of 30 percent available-sworn officer time objective for patrol response. According to SLOPD

response records, SLOPD staff has exceeded this standard and has achieved a 32-24 percent available-sworn time objective for patrol response (SLOPD 2016). Project-created increases in population may necessitate a need to hire additional officers or purchase new police equipment to maintain adequate response time objectives. As estimated in the LUCE Update EIR, with the Project’s projected population increase of 1,649 residents, the SLOPD would need two additional police officers to maintain the current ratio of 1.27 police officers per 1,000 residents, which would constitute a 3.3 percent increase in the number of sworn officers working for the City. However, hiring of two additional police officers would not necessitate police station expansion or construction.

For long-term police staff planning, the SLOPD and the City Council would address departmental budget, staffing, and equipment needs as part of the annual budgetary process. This review allows for SLOPD to determine any increases in police resources and equipment if needed. The SLOPD is funded through general fund revenues generated by property, sales, and transient occupancy taxes, all of which are expected to increase in proportion to new development within the City. Such increases in revenues could be used to hire additional officers and purchase equipment to maintain or improve SLOPD service levels over time to meet changing demands, if determined appropriate by the City Council.

While changes in police staffing would largely address this impact, recruiting and hiring additional sworn officers requires allocation of funding and would need to be implemented in a timely manner during Project construction over the next decade. Measures to decrease Project demand for police protection services, and indirect impacts to City residents associated with such increased demand, would help reduce demand for such services and allow more flexibility for City allocation of resources. In addition, proposed amendments to the AASP as part of the Project indicate that “the City shall facilitate formation of a Community Facilities District (CFD)” that “shall provide for the equitable assessment of the cost of construction and operation of public safety facilities” (Policy 7.9.1). Preparation and implementation of an onsite security plan would help minimize increased demand for police services. Therefore, with incorporation of MM PS-1 below, impacts to police protection services would be *significant but mitigable*.

#### Mitigation Measures

*MM PS-1 The Applicant shall prepare and implement a brief Security Plan for the Project site. The Security Plan shall be prepared in consultation with the SLOPD and address public safety concerns in common or public spaces, parks, bike paths and open space areas, the commercial center, and parking*

*lots. The Security Plan shall set forth lighting requirements, security recommendations for parks, open space and trails (e.g., visibility, lighting, etc.), and establish rules for use of the public areas. ~~Any private security patrol service established as part of this development shall be coordinated with the SLOPD.~~*

**Requirements and Timing.** The Security Plan shall incorporate and address all required and recommended SLOPD security measures and shall be subject to review and approval by the SLOPD. Review and approval of the Security Plan may occur prior to or subsequent to acceptance of the final Development Plan recordation of the final Vesting Tentative Tract Map (VTM). The Applicant shall demonstrate incorporation of SLOPD recommended security measures into the Development Plan prior to the issuance of grading and construction permits for each phase.

**Monitoring.** The City and SLOPD shall review the final Development Plan, Security Plan, and construction plans for each Project phase to ensure implementation of recommendations.

#### Residual Impact

Implementation of the above mitigation measure, in combination with the ability to consider increases in future police staffing, would reduce demand on SLOPD police protection services. Therefore, residual impacts would be less than significant.

**Impact PS-2 Project implementation would increase the demand for SLOFD fire protection services, create potential declines in firefighter to resident ratios, be located outside of accepted response time performance area and necessitate construction of an additional fire protection facility, with potential for secondary environmental impacts. (Significant but Mitigable).**

Project development of approximately 720 residential units with an estimated 1,649 new residents, as well as additional employees and patrons of new commercial-retail development would alter existing firefighter-to-population ratios.

Fire protection for this new development would be provided by the SLOFD and CALFIRE. In addition, new development would be subject to the SLOFD standards and California Fire Code in all proposed buildings, including installation of fire hydrants, building



sprinklers, provision of adequate water supply and pressure, placement of fire extinguishers, provision of adequate fire access to buildings, and other requirements. According to the SLOFD, AASP, and Safety Element of the General Plan, response times (travel times) to urban development should be a maximum of 4 minutes, 90 percent of the time under Safety Element Policy 9.3(A), and, as stated in the AASP, the SLOFD should maintain a firefighter-to-population ratio of approximately 1 fire fighter to every 1,000 citizens. New residential development within the Project site would increase demand for fire protection services in an area currently outside of 4-minute safe response (travel) time objective. In addition, such increased demand could cause the firefighter to resident ratio stipulated in the AASP to gradually decline over time, absent provision of new service capacity. Further, construction of new fire protection facilities has potential to cause secondary physical environmental impacts from construction and operations.

At full buildout in 2030, the Project would require approximately 1.7 new firefighters with required supporting equipment in order to maintain existing service ratios. In terms of response times, the closest SLOFD fire station (Station Four) is located at 1395 Madonna Road, approximately 2 miles west of the Project site across U.S. Highway 101, with access to the site slowed by distance, roadway configurations, geographical factors, and congestion. According to the SLOFD, the response time for emergencies to the Project site would be between 4 and 5 minutes, marginally outside of the SLOFD response time objective of 4 minutes or less travel time (SLOFD 2015b). While the City has a mutual aid agreement with CALFIRE which allows for additional fire or emergency assistance when needed, CALFIRE Fire Station 21 is located approximated 3.5 miles to the east and would have a 7-minute response time to the Project site.

Therefore, the Project has the potential to adversely impact fire protection services in conflict with adopted City policies. However, the Project would construct an Interim Fire Station at the intersection of Earthwood Lane/Venture Drive. This station is currently proposed to support two firefighters or emergency responders after 50 percent buildout of the Project site (approximately 360 units). Under current phasing, this would occur during Phase 3 of Project development in year 2024. In addition, proposed amendments to the AASP as part of the Project indicate that “the City shall facilitate formation of a Community Facilities District (CFD)” that “shall provide for the equitable assessment of the cost of construction and operation of public safety facilities (Policy 7.9.1). Further, AASP policy 7.9.3 notes that “the Avila Ranch Project may provide an interim fire and/or emergency response substation at the intersection of Earthwood Lane and Venture Drive”. Until completion of the Interim Fire Station, units within Phases 1 and 2 may temporarily

experience fire protection response times greater than 4 minutes and City residents may experience an incremental short-term decline in the firefighter to resident ratio. However, these impacts would be short-term and, after construction of Phase 3, the Interim Fire Station would provide coverage to the Project site and surrounding areas until the City's fifth fire station is constructed and operational. The 2016 San Luis Obispo Fire Department Master Plan also requires construction of a permanent station when the entire southern area of the City reaches 90 percent buildout.

The City is currently in the review process to consider establishing an impact fee program to pay for acquisition and construction of a new fire station in the southern area of the City. SLOFD staff will work with the City Manager and the City Council to review and adopt financing options for a fifth fire station given competing City general fund needs over the estimated decade or more that development of the Project site and other areas in the southern City is expected to occur. Given that this impact fee program study is not yet in place and it would likely require at least 5 to 10 years to acquire sufficient funds and to plan for building a new long-term fire station, it is unlikely that such a facility would be operational at Project buildout (SLOFD 2015c; 2016). The timing of opening a fifth fire station in the southern area of the City would be dependent on both collection of impact fees and ongoing revenue growth, as the expansion areas in the southern City would likely not develop in time to provide sufficient funding for the station in the short-term (SLOFD 2016). However, provision of the CFD as envisioned in the proposed amendments to the AASP could provide an interim financing vehicle, at least for construction and operation of the interim fire station. The following mitigation measure would be implemented in order to reduce the potential fire service impacts of the Project. With installation of the Interim Fire Station, which would be operational until the City's fifth fire station is constructed, impacts to fire protection services associated with the Project would be ***significant but mitigable***.

#### Mitigation Measures

*MM PS-2 Fair Share Contribution. The Applicant shall agree to pay a fair share contribution to a future citywide or area-wide fire protection service protection development impact fee program. Additionally, the AASP should be amended to include a fee program to fund the City's fifth fire station and/or integrate such fair share fee programs into the proposed Community Facilities District (CFD).*

**Requirements and Timing.** The City shall review and approve a fee program within the AASP or as part of the CFD to fund the new SLOFD fifth fire station and staffing. The Applicant shall pay development impact fees prior to recordation of the final VTM or enter into a binding written agreement with the City to pay a fee appropriate to the amount and size of Project development based upon the amounts set forth in the new fire protection development impact fee program.

**Monitoring.** The City shall ensure full payment of development impact fees and/or formation of the CFD.

### Residual Impact

Construction of an Interim Fire Station would serve the Project site until the fifth fire station becomes operational. Further, implementation of MM PS-2 would ensure that the Project contributes its fair share to the costs of constructing the fifth fire station. Therefore, residual impacts associated with adequate fire protection services would be less than significant throughout operation of the Project.

As described in the LUCE Update EIR, construction and operation of the fifth fire station has the potential to result in additional secondary environmental impacts such as incremental increases in traffic and air quality impacts due to increased emissions, noise from operation of engines, sirens, and loudspeakers and any site specific impacts such as site grading, erosion and sedimentation or possible impacts to biological or cultural resources; however, such site specific effects cannot be known at this time. Due to these potential additional impacts, as also described in the LUCE Update EIR, the new fire station would also likely be required to go under environmental review under CEQA before it is approved.

**Impact PS-3 Development of 720 new homes as part of the Project would generate increases in enrollment at public schools (especially Los Ranchos Elementary, Laguna Middle, and San Luis High) (Less than Significant).**

The Project would result in the development of approximately 720 residential units, consisting of 410 single-family dwellings and 310 multi-family units. Based on SLCUSD student generation rates used in the SLCUSD Enrollment Projections Capacity Analysis 2014/15 Update, it is estimated that Project development would generate approximately 256 additional school-age children (see Table 3.11-4).

**Table 3.11-4. Project Student Generation**

Grade Level	Generation Rates		Proposed Units		Additional Students
	Single-Family Units (students per unit)	Multi-Family Units (students per unit)	Single-Family Units	Multi-Family Units	
<b>K-6</b>	0.302	0.116	410	310	159.78
<b>7-8</b>	0.064	0.032	410	310	36.16
<b>9-12</b>	0.119	0.066	410	310	69.25
<b>TOTAL (K-12)</b>	<b>0.485</b>	<b>0.214</b>	<b>410</b>	<b>310</b>	<b>256.19</b>

Source: SLCUSD 2015b.

While schools within the region currently have remaining capacity, development of the Project could increase elementary school enrollment by up to 160 students, which could contribute to over-capacity at Los Ranchos Elementary School and may require increased classroom space, new teachers, and additional equipment at the school serving the Project area (City of San Luis Obispo 2014a). However, enrollment and capacity has the potential to vary by school year. As previously discussed, in 2014/15, the SLCUSD did not load three or more classrooms at each elementary school site, which could allow for additional capacity if needed. Further, the district currently accepts intra-district open enrollment, so students could be accommodated at other district schools upon request and availability.

Pending closure of the Diablo Canyon Power Plant, a significant source of revenue and funding for the SLCUSD, local schools are currently facing additional challenges in securing future funding for local schools. However, despite closure of the Diablo Canyon Power Plan and this loss of tax revenues, the SLCUSD has noted that primary and secondary school facilities within the district are currently adequate and capable of serving the proposed Avila Ranch development and managing future facility needs (refer to Comment Letter 7 in Section 8.0, *Response to Comments*).

In addition, consistent with applicable legislation, the SLCUSD currently requires all new residential and commercial development to pay developer fees to offset potential impacts of increased enrollment on City facilities through improvements to school facilities (Government Code Section 65996), which under the law is considered to be full mitigation for potential impacts. SLCUSD currently collects developer fees as authorized by SB 50 (Government Code Section 65970) to mitigate increased demand for school facilities. These fees are currently assessed at \$3.36 per square foot of residential development and \$0.54 per square foot of commercial development (SLCUSD 2015a), which would be estimated when building plans and sizes are finalized, but it is estimated to be \$3.5 million.

Given district-wide capacity and the payment of impact fees for school facilities, impacts on school facilities associated with the Project would be considered adverse but *less than significant*.

**Impact PS-4 Implementation of the Project would potentially increase the demand for public parks beyond current capacity (Less than Significant).**

The Project would result in the development of approximately 720 residential units, consisting of 410 single-family dwellings and 310 multi-family units with 1,649 new residents, including 256 school age children. Based on the population anticipated for the Project site, at least 16.49 acres of parkland would be required to meet City standards, of which 8.25 acres would need to be a neighborhood park. To address this demand, the Project intends to provide 16.0 acres of developed parkland, including a 9.8-acre neighborhood park, several mini-parks, and an onsite pocket park. The size of the 9.8-acre neighborhood park would be consistent with Policy 3.15.3 of the Parks and Recreation Element, and would be consistent with Policy 3.15.1 due to its location within 0.5 mile from most proposed residential neighborhoods. In addition, the Project is proposing to provide a contribution or fee equal to 1.5 acres to the City for community park space or community facilities. This payment of in-lieu fees for an additional 1.5 acres of parkland would allow the Project to meet/exceed the total 16.49-acre City requirement for the Project.

The Project site would comply with the City General Plan, Parks and Recreation Element by providing a total of 16.0 acres of parkland as well as a contribution or fee equal to 1.5 acres to the City for community park space or community facilities. Therefore, the Project site would result in *less than significant* impacts to parks.

#### 3.11.4.4 Cumulative Impacts

Public services within the City of San Luis Obispo are primarily provided by the City of San Luis Obispo, supplemented by interagency mutual aid agreements for fire protection services. Cumulative impacts to public services are largely related to citywide population growth. Please refer to Section 3.10, *Population and Housing* for a detailed growth forecast and the LUCE Update EIR for cumulative impacts to public services.

In addition to resident population growth, new employment, commercial, retail, and recreational uses would increase daytime populations and visitation with associated demand for public services. Planned and pending development in the City includes multiple mixed-use commercial and residential projects. These projects are also expected to expand

residential space and contribute to additional population increases in the City, thereby increasing demand for the City's public services.

The Project, in conjunction with approved, pending, or proposed development projects in the City, proposed land use changes under the LUCE, along with associated population growth, would incrementally increase overall demand for public services including fire protection, police protection, schools, and parks. The Project's contribution to potential cumulative impacts to public services is described below.

#### *Police Protection*

New development proposed as part of the Project site would contribute to cumulative citywide population growth and associated increases in demand for police protection provided by the SLOPD. Overall growth within the City is anticipated to cause an increase in demand for police services that may decrease officer to resident ratios and conflict with General Plan available time goals response goals.

Existing SLOPD staffing levels are adequate to meet the 30 percent available-time objective for patrol response, as described in the Safety Element of the City's General Plan. Per the LUCE Update EIR, if no additional police officers were hired by the City's General Plan buildout year of 2035, cumulative growth and increased population would decrease the ratio of officers to 1,000 people in the City from the existing ratio of 1.27 to a ratio of 1.03. To meet increased demand for police protection services while maintain the existing 1.27 officers per thousand residents ratio would require a total of 74 officers, an increase of 17 officers or a 28 percent increase in sworn officers. The Project would contribute approximately 12 percent of this potential increase in demand for added police staffing. However, as noted above, the City Council would address SLOPD departmental budget, staffing, and equipment needs as part of the annual budgetary process. This review allows for SLOPD to determine any increases in police resources and equipment if needed. The SLOPD is funded through general fund revenues generated by property, sales, and transient occupancy taxes, all of which are expected to increase in proportion to new development within the City. Such increases in revenues could be used to hire additional officers and purchase equipment to maintain or improve SLOPD service levels over time to meet changing demands, if determined appropriate by the City Council. Therefore, the Project's contribution towards cumulative impacts would be less than significant for police services.

### *Fire Protection*

Per the LUCE Update EIR, development proposed under the Project would contribute to cumulative citywide population growth and associated increases in demand for fire protection services provided by the SLOFD from the four existing fire stations. As a number of future developments in the City would be located in the vicinity of the Project area, additional demands would be placed on the SLOFD and the mutual aid agreement with CALFIRE. As indicated by the Fire Department Master Plan, a fifth fire station in the southern portion of the City would be required if developments, such as the Project, are to be consistent with the General Plan, Safety Element Policy 3.0. The Interim Fire Station would be implemented by the Project at the intersection of Earthwood Lane and Venture Drive within the Airport Area, and would be subject to the City's approval and consistent with the General Plan's Safety Element. This fire station would remain operational until establishment of the City's fifth fire station to serve the southern region of the City. Inclusion of this Interim Fire Station would counteract any cumulative impacts of the Project on the City's existing fire services.

Upon development of the fifth fire station, cumulative impacts to fire protection services would continue to be less than significant.

### *Schools*

Per the LUCE Update EIR, the total estimated enrollment generation that would result from LUCE buildout, based on development of approximately 4,904 new dwelling units (2,420 single-family dwellings and 2,484 multi-family units), is projected to be 911 new students. Land use changes anticipated to occur under the Project could add up to approximately 270 new school-aged residents, contributing to future over-capacity at certain schools and potentially requiring increased classroom space, new teachers, and additional equipment at the schools serving the Project area. Thus, the Project and other projected growth in the City would contribute incrementally to increased enrollment within the SLCUSD.

SLCUSD estimates that one or possibly two additional school sites will be needed to serve planned residential growth in the southern part of the City. The Orcutt Area Specific Plan is expected to include a potential elementary school site. Due to district budget constraints, new dwellings will have serious adverse consequences for school staffing, facilities, and programs unless new development adequately mitigates the adverse impact on school facilities. Mitigation is in the form of development fees (\$3.36 per square foot of residential development and \$0.54 per square foot of commercial development) assessed with

issuance of construction permits. School district fees are collected by the City and used by the district to fund school infrastructure needs (City of San Luis Obispo 2015b). In addition, school bond Measure D was passed in November 2014, allocating \$177 million to address longstanding facility, technology, and infrastructure needs throughout the district, including classroom construction and renovation, facilities updates and upgrades, and infrastructure energy efficiency improvements (SLCUSD 2015a). Given the payment of developer fees for school facilities under the Project (which constitutes full mitigation pursuant to SB 50), cumulative impacts would be less than significant.

#### *Parks and Recreation*

The Project would contribute to increased demand for park and recreational due to approved, pending or proposed citywide development and associated population growth (Table 3.0-1). Implementation of cumulative development projects in combination with the Project, would result substantial increased use of, and demand for, park and recreation facilities.

The City General Plan, Parks and Recreation Element requires that neighborhood and community park facilities be provided at a ratio of 10 acres of parkland per 1,000 persons. Under existing conditions, the City Park Department maintains a total of 151.65 acres of parks, landscape areas, and open spaces (City of San Luis Obispo 2012), significantly less than what is required under City standards to support current estimated City population of 46,456 (U.S. Census Bureau 2015). In addition, 572 acres of parkland would be required to support the projected future population of 57,200 individuals as projected under development of land uses permitted under the LUCE, which would result in a projected need of 420.5 acres of additional parkland. However, the Project would not contribute to cumulatively considerable impacts as the Project would provide adequate parkland under City standards along with payment of development impact fees to accommodate the park and recreation needs of the 1,649 future Project residents. Therefore, the Project would not result in substantial deterioration of these facilities or service levels and this impact would be less than significant.