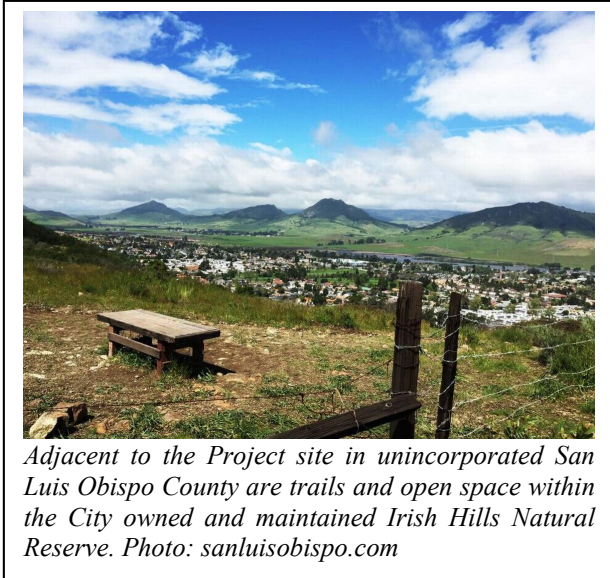


**3.12 PUBLIC SERVICES AND RECREATION**

This section describes existing and planned public services and evaluates the operation and capacity of these services with the development of the Project. Public services provided within the Project vicinity would include police, fire protection services, schools, and public libraries. Recreation and parks facilities in the area include surrounding neighborhood parks, as well as City owned and maintained open space areas, such as the adjacent Irish Hills Natural Reserve. Table 3.12-1 describes those public agencies providing public services to the Project site and surrounding vicinity.



*Adjacent to the Project site in unincorporated San Luis Obispo County are trails and open space within the City owned and maintained Irish Hills Natural Reserve. Photo: sanluisobispo.com*

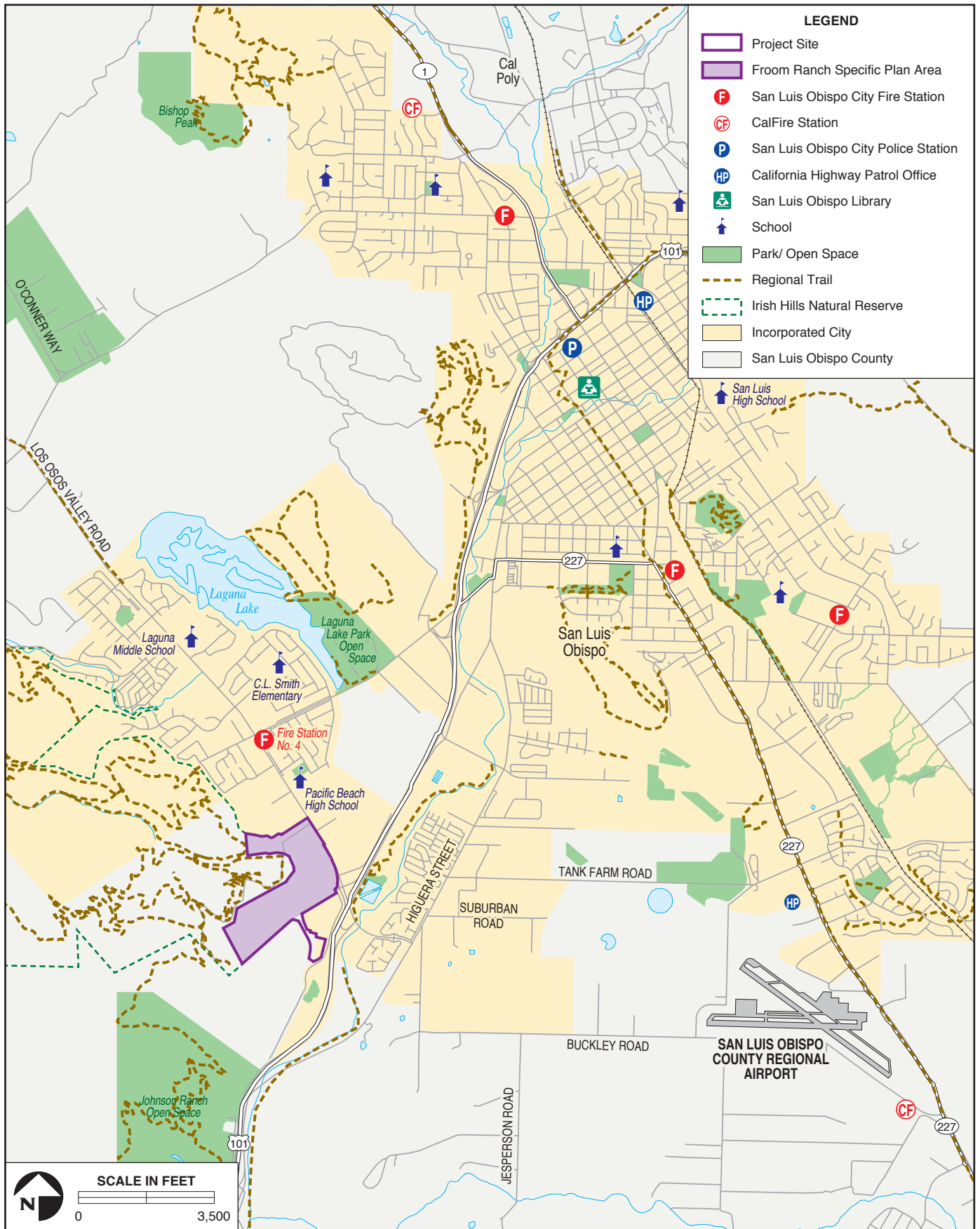
**Table 3.12-1. Public Services Serving the Project Vicinity**

Public Services Serving Froom Ranch	
<b>Fire Protection</b>	SLOFD, San Luis Obispo County Fire Department (CALFIRE through a contract with the County)
<b>Law Enforcement</b>	City of San Luis Obispo Police Department (SLOPD), San Luis Obispo County Sheriff’s Office (County Sheriff)
<b>Public Schools</b>	San Luis Coastal Unified School District
<b>Public Libraries</b>	San Luis Obispo County Library
<b>Public Parks</b>	City of San Luis Obispo Department of Parks and Recreation

For information regarding public transportation and roadways please refer to Section 3.13, *Transportation and Traffic* and for public utilities such as water, wastewater, solid waste, and energy utilities, please refer to Section 3.14, *Utilities and Energy Conservation*.

**3.12.1 Environmental Setting**

Figure 3.12-1 shows the key existing public facilities operated by the City and County, which are located in the vicinity of the Project site.



### 3.12.1.1 Police Services

The San Luis Obispo Police Department (SLOPD) provides law enforcement and community services within the City, and the County of San Luis Obispo Sheriff's Office (County Sheriff) operates within unincorporated areas of the County. The SLOPD operates out of one main police station located at 1042 Walnut Street, southeast of the intersection of Santa Rosa Street (Highway 1) and U.S. 101. Full-time SLOPD staff include 89.5 employees, 61 of whom are sworn police officers who provide law enforcement, supervision, and management duties. The Department supports the City with new development and hires as appropriate based on service requirements (Personal Communication with SLOPD Watch Officer 2018). The SLOPD increased from 59 to 61 sworn police officers in 2019 by adding one School Resource Officer (SRO) and one Cannabis Detective position. The SRO was added to police staffing after the Police Department and City signed a Memorandum of Agreement (MOA) with San Luis Coastal Unified School District. Under the MOA, San Luis Coastal Unified School District agreed to fully fund one full-time police officer position that will be dedicated to the schools within the City of San Luis Obispo. The Cannabis Detective position was established to help manage the cannabis industry being established in the City. This position will conduct background checks on all business applications and owners, prior to the approval of their application. They will also background check all employees, once the business has been approved to operate within the City. As businesses become operational, the Cannabis Detective will conduct regular compliance checks to ensure these businesses are in compliance with their use permits.

Prior to these planned increases, the SLOPD had not increased staffing numbers in over 30 years (SLOPD 2019). Neither the General Plan nor the SLOPD establishes staffing ratio goals for the Department; instead, the SLOPD uses the International Association of Chiefs of Police Model (not a per-capital model) to assess the need for officers and equipment based on many factors related to the amount of police officer time spent on different activities. Additionally, the last time a new SLOPD facility was determined to be necessary was 1987. The City is currently working on design plans for a facility redesign, which is estimated to be a seven- to eight-year process, based on projected demand for size and staffing (SLOPD 2019). The SLOPD is divided into two police bureaus, with a Police Captain commanding each. The Operations Bureau includes Patrol Services, the Traffic Safety Unit, downtown bike officers, the Community Action Team, and Neighborhood Services. The Administration Services Bureau includes the Investigations Unit, Special

Enforcement Team, Communications Division, the Records Unit, Property, Administrative Training/Hiring, and the Department Chaplains (SLOPD 2018).

The nearest County Sheriff's office is at 1050 Monterey Street, located about six minutes from the Project site (typical driving time), and is primarily focused on civil enforcement.

According to the General Plan SE, the SLOPD has a 30 percent available time objective for patrol response. 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.

The ratio of officers to 1,000 persons in the City of 1.15, which represents a decrease from 1.27 per 1,000 persons in 2014 (Governing 2016). However, based on the City's current 2019 population of 46,802, the ratio of officers to 1,000 persons in the City is currently approximately 1.30.

In 2016, police officers responded to 32,738 calls for service with a permanent population of 45,950 and a daily service population of approximately 90,000 (SLOPD 2017).<sup>1</sup> A five-year average of calls for service and permanent population equates to each resident requiring a rate of 0.67 calls for service per resident per year. One officer responds to an average of 925 calls per year. A new or replaced police station has been identified as important by City voters, particularly due to the age of the existing facility, and would require approximately \$43.7 million in funds. The new police facility is expected to follow a seven-year planning period with 20 percent design plans anticipated in the near future.

#### 3.12.1.2 Fire Protection Services

The majority of the Project site is located in a Moderate FHSZ, and the highest elevation areas within the southwestern region of the Project site are located in a High FHSZ within the County LRA (see Figure 3.7-1).<sup>2</sup> As discussed further in Section 3.7, *Hazards, Hazardous Materials, and Wildfire*, high wildfire hazards are identified in the highest elevation areas and are associated with highly flammable chaparral, grassland, and

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<sup>1</sup> Daily service population includes residents of the City, as well as the estimated number of workers and visitors present within the City on a given day.

<sup>2</sup> The SRA is the area in the state where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The LRA is an area where local agencies have primary financial responsibility for fire suppression.

woodland habitats in areas of steep slopes from the Irish Hills with no recent history of burn and high amounts and concentrations of biofuel accumulation.

The SLOFD provides emergency and non-emergency fire, rescue, and medical services, through an agreement with CALFIRE, which supports all County firefighting activities 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 crews 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, five are fire prevention and educational staff, and the remaining 45 are firefighters with emergency response capabilities (City of San Luis Obispo 2018). Based on the City’s population of 46,802 in 2019 (California Department of Finance 2019), the City currently has a firefighter-to-population ratio of 1:866.

Fire Station One: Constructed in 1996, this station is located south of downtown at 2160 Santa Barbara Avenue. This is the newest fire station in the City and 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 a state-owned Type 1 pumper/engine.

Fire Station Two: Constructed in 1954, this station is located near the Cal Poly campus at 126 North Chorro Street. This is the oldest station in the City and is staffed with a 2017 75-foot quint ladder truck and a reserve Type I pumper/fire engine.

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 crew (Type I pumper/fire engine). Additional equipment housed at Fire Station Three includes the reserve Type I pumper/fire engine.

Fire Station Four: This fire station is the closest to the Project site, approximately 0.5 mile northwest of the site at the intersection of Madonna Road and LOVR. Constructed in 1978, this station is the western-most station in the City. The station is staffed with a three-person

paramedic engine crew (Type I pumper/fire engine). Additional equipment housed at Fire Station Four includes an unstaffed Type III fire apparatus.

Existing SLOFD Response Times

According to the General Plan SE, 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 0.5 mile northwest of the Project site. According to Geographic Information System (GIS) analysis and confirmation with SLOFD, the response time for emergencies to the Project site would be approximately 3 minutes, within the General Plan SE minimum travel time goal of 4 minutes or less of travel time (Personal Communication With SLOFD Fire Chief 2018).



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

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 2016a). CALFIRE Fire Station 21 would be the nearest County jurisdictional station to provide responses for the Project site. Fire Station 21 is located approximated 2.7 miles to the east and would have a 9- to 11-minute response time to the Project site along 3.6 miles of roadway (Google Earth 2019).

CALFIRE Fire Station 21: This station is located at the Airport on 4671 Broad Street and is one of the newest fire service facilities in the County. This fire station is staffed with a two-person basic life support engine crew 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 Heavy Rescue and Water Tender (water truck) (CALFIRE 2016b).

## 3.12.1.3 Schools

The San Luis Coastal Unified School District (SLCUSD) provides educational services for the City of San Luis Obispo, the City of Morro Bay, and a portion of the unincorporated areas of the County surrounding Avila Beach, Los Osos, the City, and Morro Bay. The SLCUSD operates a variety of educational programs and schools, which include 10 elementary schools, two middle schools, two high schools, one continuation school, and one adult school (SLCUSD 2018a). The closest schools to the Project site are C. L. Smith Elementary School (0.8 mile north), Laguna Middle School (1.1 mile northwest), and Pacific Beach High School (0.2 mile north). The Project site is located within the enrollment boundary for the Pacheco Elementary School, C.L. Smith Elementary School, Bishop's Peak/Teach Elementary School, Laguna Middle School, and San Luis Obispo High School; however, families within the SLCUSD can apply for intra-district transfers to request enrollment at a different school (SLCUSD 2019). Table 3.12-2 summarizes existing capacity and enrollment at SLCUSD schools from the 2016 to 2017 school year.

**Table 3.12-2. Existing Capacity and Enrollment at SLCUSD Schools (2016-2017)**

School	Capacity	Enrollment	% Utilization	Remaining Capacity (Percent Remaining)
<b><i>Elementary</i></b>				
Baywood Elementary	432	305	71	127 (29%)
Bellevue-Santa Fe Charter	154	160	104	-6 (-4%)
Bishop's Peak/Teach Elementary	542	468	86	74 (14%)
Del Mar Elementary	477	375	79	102 (21%)
Hawthorne Elementary	390	372	95	18 (5%)
Los Ranchos Elementary	460	457	99	3 (1%)
Monarch Grove Elementary	470	347	74	123 (26%)
Pacheco Elementary	528	551	104	-23 (-4%)
Sinsheimer Elementary	467	376	81	91 (19%)
C.L. Smith Elementary	452	367	81	85 (19%)
<b>Elementary School Total</b>	<b>4,372</b>	<b>3,778</b>	<b>86</b>	<b>594 (14%)</b>
<b><i>Middle School</i></b>				
Laguna Middle School	1,118	817	73	301 (27%)
Los Osos Middle School	1,073	599	56	474 (44%)
<b>Middle School Total</b>	<b>2,191</b>	<b>1,416</b>	<b>65</b>	<b>775 (35%)</b>
<b><i>High School</i></b>				
San Luis Obispo High School	2,034	1,526	75	508 (25%)
Morro Bay High School	1,400	821	59	579 (41%)
Pacific Beach High School	140	53	38	90 (62%)
<b>High School Total</b>	<b>3,574</b>	<b>2,400</b>	<b>67</b>	<b>1,174 (33%)</b>

Source: CA Department of Education 2018.

SLCUSD currently provides 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 2015). While three elementary schools are operating either at or over capacity, C.L. Smith Elementary, the nearest elementary school to the Project site, retains some room for growth (refer to Table 3.12-2; CA Department of Education 2018).

#### 3.12.1.4 Recreation and Parks

The City 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 28 parks and recreational facilities located throughout the City, in addition to 10 designated Natural Reserves and open space areas and two bike trails (City of San Luis Obispo 2019). The City contains over 55 miles of open space trails within approximately 3,800 acres of open space. There are at least four

designated parks within 1.0 mile of the Project site, including Vista Lago Park (0.9 mile north), Smith Park (0.8 mile north)<sup>3</sup>, Laguna Lake Park (0.7 mile north), and De Vault Park (0.4 mile northwest). Hiking and walking trails are located within the Laguna Lake Park Open Space (located in the City 0.7 mile north), Johnson Ranch City Open Space (located in the County 0.4 mile south), and Irish Hills Natural Reserve (City



*The Irish Hills Natural Reserve is located immediately adjacent to the western boundary of the Project site, offering miles of hiking and biking trails.*

Open Space located in the County immediately west, and beyond within the City boundary).

The City General Plan Parks and Recreation Element (PRE), 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 five acres are required to be neighborhood parks. The City Parks and Recreation Department maintains a total of 205.6 acres of community parks, mini parks, recreation centers, and special recreational features, of which 34.7 acres are neighborhood parks (City of San Luis Obispo 2019). Based on existing

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<sup>3</sup> Smith Park is not a City-operated or maintained and is instead operated and maintained as part of the SLCUSD.



population (approximately 46,802 persons) and parks acreage conditions, this results in approximately 3.65 acres of total parkland per 1,000 residents, and 0.74 acre of neighborhood parks per 1,000 residents. Under these conditions, the City needs approximately 297.12 acres of parkland to meet the recreational demand for existing residents, of which 199 acres should be neighborhood parks, to meet the City per capita parkland standard.

### **3.12.2 Regulatory Setting**

Public services and recreational resources are governed primarily by local jurisdictions and state regulations. Regulations that are directly relevant to the Project are summarized below.

#### 3.12.2.1 Federal

##### Code of Federal Regulations (CFR)

Under 29 CFR 1910.38, when required by an OSHA standard, an employer must have an Emergency Action Plan in writing, kept in the workplace, and available to employees for review. An employer with ten or fewer employees may communicate the plan orally to employees. Minimum elements of an Emergency Action Plan include the following procedures: reporting a fire or other emergency; emergency evacuation, including type of evacuation and exit route assignments; employees who remain to operate critical plant operations before they evacuate; accounting for all employees after evacuation; and employees performing rescue or medical duties.

Under 29 CFR 1910.39, an employer must have a Fire Prevention Plan. A Fire Prevention Plan must be in writing, be kept in the workplace, and be made available to employees for review; an employer with ten or fewer employees may communicate the plan orally to employees.

Under 29 CFR 1910.155, Subpart L, Fire Protection, employers are required to place and keep in proper working order, fire safety equipment within facilities.

#### 3.12.2.2 State

##### California Code of Regulations Sections

Under this section Title 19 of the CCR, the California State Fire Marshal develops regulations relating to fire and life safety. These regulations have been prepared and adopted to establish minimum standards for the prevention of fire and for protection of life

and property against fire, explosion, and panic. The California State Fire Marshal also adopts and administers regulations and standards necessary under the California Health and Safety Code to protect life and property.

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.

#### California Occupation Safety and Health Administration

The California OSHA (CAL-OSHA) requires that a minimum of two firefighters, operating as a team, conduct interior firefighting operations while a minimum of two firefighters must be positioned outside and remain capable of rapid intervention and rescue if needed pursuant to the State of California's "Two-In, Two-out" law [29 CFR 1910.134(g)(4)]. If there are only three firefighters assigned to a fire engine, the engine company must wait for back-up to arrive before being able to engage in interior firefighting operations to be in compliance with CAL-OSHA regulations.

#### 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 five acres of parkland per 1,000 residents to serve the needs of residents of the subdivision and the greater public residing in the City.

#### 3.12.2.3 Local

##### City of San Luis Obispo General Plan

The City provides public services, emergency protection services, and public parks and recreational facilities 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 local policies that would apply to the Project are contained in the plans and policies section of the following General Plan Elements.

*Safety Element (SE)*

**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 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.

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 4 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 Public Works Department and the Utilities Department will set response-time objectives, based on the values at risk and acceptable levels of risk, and will work to achieve the objectives. Typical incidents requiring timely response are water main breaks and large tree downs in the street.

**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.

*Parks and Recreation Element (PRE)*

**Policy 3.13.1 The Parks System.** The City shall develop and maintain a park system at a rate of ten acres of parkland per 1,000 residents. Five acres shall be dedicated as a neighborhood park. The remaining five acres required under the ten acres per

1,000 residents in the residential annexation policy may be located anywhere within the City's park system as deemed appropriate.

**Policy 3.14.4** New significant residential developments and annexations, shall provide sufficient athletic fields to meet the demands of the youth who will reside in the development.

**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.

**Policy 3.16.4 Community Center.** While major facilities shall be designed to meet multi-generational needs, there shall also be space available to address the unique needs of the senior population.

**Policy 5.0.1 Facilities.** The City shall continue to acquire and develop parkland through the development review and annexation process.

**Policy 5.0.2. Facilities.** For annexation areas, at least ten acres of developed parkland for each 1,000 new residents shall be provided by the developer.

### **3.12.3 Environmental Impact Analysis**

#### 3.12.3.1 Thresholds of Significance

The thresholds of significance listed below are based on Appendix G of the CEQA Guidelines. The effects of the Project on public services would be considered a significant impact if the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- a) Fire protection;
- b) Police protection;

- c) Schools;
- d) Parks; and/or
- e) Other public facilities.

The effects of the Project on recreation would be considered a significant impact if the project would:

- a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

#### 3.12.3.2 Impact Assessment Methodology

This section evaluates the adequacy of existing police and fire protection services, public schools, parks and recreational facilities to serve the Project, including any planned improvements to these services. The analysis identifies Project-related 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 as a result 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.

#### Public Services

To assess impacts on public service systems, existing and forecast capacities of service providers were obtained from the LUCE Update EIR, SLCUSD, SLOFD and SLOPD management personnel, and General Plan documents. The goals and policies of the General Plan SE provided additional information used to establish thresholds for levels of significance for public services. SLOFD and SLOPD provided guidelines for determining potential impacts to police and fire protection services, specifically staffing and service demands. For determining impacts, the Project is evaluated for its likelihood to reduce the City's 30 percent available-time sworn officer objective established in the General Plan SE. Impacts to fire protection services are evaluated in the context of SLOFD's adequate response time and anticipated number of calls for emergency services based on the type of development proposed under the Project. Information and personal communications from CALFIRE and SLCUSD contributed to the analysis.

As the Project site would be annexed into the City, development of the Project site with residential and commercial uses would increase demand on City services, including fire protection, police protection, and other City-supported public services. The City has a system of required developer impact fees and dedications established to address direct demand for new facilities associated with new development, while potential increases in property tax revenue associated with valuation of new residential units, businesses, and other revenues (e.g., sales tax) would help offset the increased ongoing cost of provision of public services to new residential and commercial uses. As discussed in Section 3.11, *Population and Housing*, population estimates are based on the most recent SLOCOG 2050 regional growth factor, as detailed in Table 3.11-14, *Summary of Estimated Population Generated by the Project*.

#### Recreation

Information and forecast capacities of the City's recreational facilities were obtained from the 2014 LUCE Update EIR, City Parks and Recreation Department staff, and General Plan documents. Project-related increases in population were assessed to identify increased demand for parks and recreational facilities. The goals and policies of the General Plan PRE provide additional information used to establish thresholds for levels of significance.

Because Villaggio would serve an older population (60 years and older), the unique needs of senior populations were reviewed and researched to identify potential unique or different recreational demand reflective of the needs of a senior population. Other environmental documents associated with senior living facilities were also examined, including projects in the cities of Los Angeles, Sacramento, and Buellton as well as the County of Monterey (City of Buellton 2013; City of Los Angeles 2003; 2008; County of Monterey 2018; City of Sacramento 2016). These environmental documents found that residents in assisted living facilities, which are not as active as residents in independent living facilities, are served by onsite recreational facilities and generally do not require additional offsite amenities beyond those provided at the facility. However, these documents found that independent living residents required a mix of recreational amenities, including recreational facilities within the senior living center and offsite recreational facilities consistent with the standards of the local jurisdiction's parks and recreation department. Senior citizen interest associations and action plans from the U.S. Department of Health & Human Services and American Association of Retired Persons (AARP) were also reviewed to determine the interests and needs of senior populations (U.S. Department of Health & Human Services 2018; AARP 2016). These associations generally advocate for the needs

of senior citizens to remain active in a variety of recreational pursuits, though they did not provide quantified data on the recreational demand of senior populations.

3.12.3.3 Project Impacts and Mitigation Measures

Implementation of the Project has the potential to increase population and associated demand on public services and parks and recreational facilities. The Project would result in the following impacts to public services, parks, and recreational facilities. Impacts are described further below and summarized in Table 3.12-3.

**Table 3.12-3. Summary of Project Impacts**

Impacts on Public Services, Parks, and Recreational Facilities	Mitigation Measures	Residual Significance
PS-1. The Project would increase demand on the SLOPD for police protection services.	None required	Less than Significant
PS-2. The Project would increase the demand on SLOFD and CALFIRE for fire protection services and create potential declines in firefighter-to-population ratios; however, the Project would be located within the accepted response time performance area. Development of senior residential uses, which are associated with higher than average calls for emergency medical service, would increase emergency calls for service	None required	Less than Significant
PS-3. The Project would generate increases in enrollment at public schools (especially C.L. Elementary and Laguna Middle Schools).	None required	Less than Significant
PS-4. The Project would increase the demand for public parkland and neighborhood parks from increased residential population.	MM PS-1 MM PS-2	Less than Significant with Mitigation

**Impact PS-1 The Project would increase demand on the SLOPD for police protection services (Less than Significant).**

The Project would annex the Project site to the City, placing the site under the jurisdiction of the SLOPD for providing law enforcement services, and would result in development of 578 residential units, 100,000 sf of retail-commercial space, a 2.9-acre public park, and additional facilities within Villaggio such as health care facilities, a recreation center, restaurants, and theaters. At full buildout, the Project site would support a population of approximately 1,231 residents, as well as patrons or users of the 100,000-sf retail-commercial space, public park, and other amenities and facilities within the Specific Plan

area. New residential and non-residential development as part of the Project would increase the existing City population of 46,802 people by approximately 2.6 percent to 48,033 people, increasing demand for SLOPD police protection services and responses to incidents. Because the Project would be implemented over approximately five years, increases in call volumes for SLOPD services would occur incrementally over that period of 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 General Plan SE standard of 30 percent available-time sworn officer objective for patrol response. According to SLOPD response records, SLOPD staff has exceeded this standard and has achieved a 32 to 24 percent available-time objective for patrol response (SLOPD 2016), which the SLOPD continues to strive to maintain (Personal Communication with SLOPD Watch Officer 2018). Project-created increases in population may necessitate the need to hire additional officers or purchase new police equipment to maintain adequate response time objectives. The City currently has a ratio of 1.30 officers per 1,000 residents. Based on the current City population of 46,802, the addition of 1,231 residents as a result of implementation of the Project (total population of 48,033) would incrementally reduce this ratio to 1.27. Therefore, the Project would not reduce the available-time sworn officer objective below the General Plan SE's target goal.

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 have been included in the Draft FRSP to decrease Project demand for police protection services, which would help reduce any indirect impacts to City residents associated with such increased demand and allow more flexibility for City allocation of resources. For instance, the Draft FRSP includes Section 4.8, Security Planning, which



details security initiatives designed to be consistent with SLOPD's Crime Prevention Through Environmental Design Principles. Additionally, Program 4.8a of the Draft FRSP assures coordination with SLOPD in the preparation of a security plan prior to issuance of building permits, including consideration for onsite first responders and private security staff. Villaggio's proposed perimeter fencing, gated entry, and onsite security personnel would also be considered in the security plan, which would likely reduce the number of police calls and associated demand on police services.

While the Project would incrementally increase demand for police services, the increase would not result in the need for new or physically altered facilities the construction of which would cause significant environmental impacts. Therefore, impacts to police protection services would be adverse but *less than significant*.

**Impact PS-2 The Project would increase the demand on SLOFD and CALFIRE for fire protection services and create potential declines in firefighter-to-population ratios; however, the Project would be located within the accepted response time performance area. Development of senior residential uses, which are associated with higher than average calls for emergency medical service, would increase emergency calls for service (Less than Significant).**

Project development of approximately 578 residential units with an estimated 1,231 new residents, as well as additional employees and patrons of new commercial-retail development, the proposed public park, and other onsite facilities would alter the existing firefighter-to-population ratio of 1:862.

Fire protection for this Project would be provided by the SLOFD and CALFIRE. The first responders to a structural fire would consist of SLOFD, while response to a wildfire would consist of both SLOFD and CALFIRE resources. SLOFD would also respond to emergency medical (paramedic) and assistance calls within the Project site. 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 and the General Plan SE, response times (travel times) to urban development should be a maximum of four minutes, 90 percent of the time under General Plan SE Policy 9.3(A). In terms of response times, the closest SLOFD fire station (Station Four) is located at 1395 Madonna Road, approximately 0.5 mile west of the Project site with a three-minute response time

(Google Earth 2019). Therefore, the Project would be within the City's and SLOFD's established adequate response time of four minutes.

Buildout of the Project would incrementally reduce the City's existing firefighter-to-population ratio from 1:862 to 1:885. To maintain the existing firefighter-to-population ratio, the Project would require approximately 1.2 new firefighters. However, the SLOFD currently anticipates adequate resources exist to serve the Project consistent with its established 4-minute response time goal without the need for additional personnel. Further, the 2016 SLOFD Master Plan also requires construction of a permanent station when the entire southern area of the City reaches 90 percent buildout. The new station would likely be constructed on the east side of U.S. 101, but would serve the southern portions of the City and help ensure the SLOFD is able to continue to meet its response time goal (SLOFD 2016). Therefore, implementation of the Project would not result in the need for construction of a new fire station or similar facilities.

Based on the Project's location within the adequate safe response time area of service, standard residential and commercial land uses proposed under the Project are considered to be reasonably served by existing SLOFD resources with payment of the City's appropriate capital facilities fees. The Project, however, would also develop 404 units of new senior housing, assisted living, and health care uses (e.g., senior residential uses). The SLOFD considers certain development and uses, including senior residential development, to be uses which would result in a higher than normal amount of calls for service compared to other types of development. Senior residential uses in the City have historically generated higher levels of calls for service. The SLOFD believes the Project would not result in a significant increase in demand for fire or emergency response services, and that adequate resources and staff exist to serve the proposed development (SLOFD 2019). Given adequate staffing and response times exist to serve the Project and no expansion of existing facilities would be required as a result of Project implementation, impacts would be adverse but *less than significant*.

**Impact PS-3 The Project would generate increases in enrollment at public schools (especially C.L. Elementary and Laguna Middle Schools) (Less than Significant).**

The Project would result in the development of approximately 578 residential units. However, Villaggio is not expected to generate school-aged populations. Therefore, this analysis only considers the 174 multi-family units proposed for Madonna Froom Ranch. Based on SLCUSD student generation rates used in the SLCUSD Enrollment Projections

Capacity Analysis, it is estimated that Project development would generate approximately 37 additional school-age children (see Table 3.12-4; CA Department of Education 2018).

**Table 3.12-4. Project Student Generation**

Grade Level	Generation Rates		Proposed Units	
	Multi-Family Units (students per unit)		Multi-Family Units	Additional Students <sup>1</sup>
<b>K-6</b>	0.116		174	20
<b>7-8</b>	0.032		174	6
<b>9-12</b>	0.066		174	11
<b>TOTAL (K-12)</b>	<b>0.214</b>		<b>174</b>	<b>37</b>

Source: CA Department of Education 2018.

<sup>1</sup> Rounded to the nearest whole value.

Assuming that the increase of students attributable to the Project would attend the schools for which the Project site is located within the enrollment boundary at the respective education levels, all respective schools for each grade level would have remaining capacity to accommodate an increase in student population from the Project, with the exception of Pacheco Elementary (see Table 3.12-5). While Pacheco Elementary enrollment currently exceeds its capacity, alternative elementary schools with which the Project site is located within the enrollment boundary (e.g., C.L. Smith Elementary and Bishop's Peak/Teach Elementary) have available capacity to accommodate new students associated with the Project. Although proximate schools have adequate capacity for the generated student population, the students may attend schools in the area that are over 90 percent capacity, resulting in a potential exceedance of SLCUSD's ideal school utilization rates (90 percent capacity for elementary schools and 85 percent capacity for middle schools). In these instances, schools may require increased classroom space, new teachers, and additional equipment at the school serving the Project vicinity. Nevertheless, enrollment and capacity have the potential to vary by school year, and the district currently accepts open enrollment, and students could be accommodated at other district schools upon request and availability.

**Table 3.12-5. Student Accommodation by Nearest Schools**

Nearest School	Remaining Capacity at Schools	Project Contribution	Capacity to Accommodate?
Pacheco Elementary (K-6)	-23	20	No
C.L. Smith Elementary (K-6)	85	20	Yes
Bishop’s Peak/Teach Elementary	74	20	Yes
Laguna Middle School (7-8)	301	6	Yes
San Luis Obispo High School (9-12)	508	11	Yes

Source: CA Department of Education 2018.

<sup>1</sup> Rounded to the nearest whole value.

In addition, the SLCUSD currently requires all new residential and commercial development to pay developer fees to offset potential impacts of increased enrollment on City school facilities (Government Code Section 65996), which is considered to be full mitigation for potential impacts. These fees are currently assessed at \$3.79 per sf of residential development and \$0.61 per sf of commercial development (SLCUSD 2018b). Fees would be estimated for residential development when building plans and sizes are finalized; the proposed 100,000 sf of commercial uses would require approximately \$61,000 in fees. Given district-wide capacity and the payment of impact fees for school facilities, impacts on school facilities associated with the Project would be adverse but *less than significant*.

**Impact PS-4 The Project would increase the demand for public parkland and neighborhood parks from increased residential population (Less than Significant with Mitigation).**

As detailed within Section 3.11, *Population and Housing*, the Project is anticipated to generate approximately 1,231 new residents (including 37 school-age children), which would utilize Project-proposed recreational facilities, as well as existing parks and recreational facilities within the City and surrounding area (e.g., Irish Hills Natural Reserve). Increased use of existing neighborhood parks or parkland in the City and County, including trails in the Irish Hills Natural Reserve, would accelerate physical deterioration of existing facilities. The Project proposes a 2.9-acre public park and a public trail along realigned Froom Creek that would potentially affect existing resources onsite as described in this EIR, including impacts to aesthetic, biological, cultural, and soil resources. Further, the City’s General Plan PRE requires Expansion Areas and all residential annexation areas such as the Project site to provide developed neighborhood parks at the rate of five acres

per 1,000 residents and at least ten acres of developed parkland for each 1,000 new residents. The Project site is an Expansion Area defined by the General Plan and would be an annexation to the City. As such, City policies would require additional parkland to serve the Project's future residential populations. As described in Section 3.12.3.2, Villaggio would serve an older population with unique needs from typical residential uses. Therefore, the Madonna Froom Ranch and Villaggio components of the Project are discussed separately in the following sections.

### *Villaggio*

Senior citizen populations generally seek recreational facilities such as gyms and exercise rooms, outdoor/indoor pools, indoor socialization centers, walking paths, and similar facilities that may facilitate persons with reduced mobility (AARP 2016). The Project includes a variety of resident-only recreational facilities onsite to serve the needs of senior citizens. Recreational opportunities and facilities such as an outdoor swimming pool, gym, pickle ball, bocce ball, community gardens, theater, outdoor seating areas, library, and craft rooms would be included within Villaggio. Additionally, Villaggio would provide walking paths, including the proposed Froom Creek Trail and internal trails throughout the developed areas. Access would also be available to the existing public trails within the Irish Hills Natural Reserve for Villaggio residents via gated access points.

As detailed within Section 3.11, *Population and Housing*, the anticipated increase in residential population by 825 persons within Villaggio would incrementally increase use of and demand for parks and recreational facilities. Villaggio would contain 38 assisted living units and 51 skilled nursing and memory care beds, totaling approximately 93 persons that would require special recreational needs with facilities that would accommodate persons needing mobility support and transportation. The onsite recreational amenities would provide the range of amenities to serve these special recreational needs for 93 residents. Villaggio would also support an estimated 732 independent living/active senior residents. Both groups of residents would be able to utilize onsite recreational facilities provided within Villaggio, but active seniors would also likely use offsite parks and open spaces, hiking trails, and other outdoor amenities, including the Irish Hills Natural Reserve, City-owned and maintained trails and open spaces, City parks, community centers (e.g., SLO Senior Center), and sports facilities such as tennis courts. Increased demand generated by the Project and use of existing public recreational facilities by Villaggio would contribute to the use and physical deterioration of existing facilities.

As described above, Villaggio's proposed onsite amenities are considered adequate to serve up to 93 senior residents with special recreational needs, so recreation demands of the Project would be reduced from that typically anticipated under City standards. To meet the goals and policies of the General Plan PRE and decrease the rate of deterioration of existing facilities from increased demand, the Project's increase of 732 independent living population would require development of an additional 7.32 acres of parkland including at least 3.66 acres of neighborhood park within the City, which would be partially satisfied by the proposed public park within Madonna Froom Ranch and proposed public recreational facilities such as the Froom Creek Trail, as described below. As this requirement would not be met entirely with onsite recreational facilities, the potential impact associated with Villaggio's residents contribution to increased rates of physical deterioration of existing facilities offsite and the need for additional recreational facilities to adequately serve this population consistent with City policy is considered *potentially significant*.

*Madonna Froom Ranch*

As detailed within Section 3.11, *Population and Housing*, Madonna Froom Ranch is anticipated to generate approximately 406 new residents, including approximately 37 school-age children. Based on the anticipated increase in new residents of Madonna Froom Ranch, increased use and demand by Project residents may result in accelerated physical deterioration of existing facilities.

The Project would provide onsite public amenities that would partially offset the impact of increased demand for City park and recreational facilities generated by Madonna Froom Ranch. This includes a 2.9-acre public park that would provide the basic elements of a neighborhood park as defined within the General Plan PRE, including benches, picnic tables, restrooms, and a playground. In addition, the Project would develop a publicly accessible Froom Creek Trail that would extend from the existing trail system in the Irish Hills Natural Reserve through the Specific Plan area with a terminus near the Calle Joaquin wetlands.

Based exclusively on the population anticipated for Madonna Froom Ranch, at least 4.06 acres of public park would be required to meet the General Plan PRE Policies 3.13.1, 3.15.1, and 5.0.2, of which approximately 2.03 acres would need to be a neighborhood park. The Project would provide 2.9 acres of neighborhood park, thereby meeting the City's standard, but would be deficient in approximately 1.16 acres of required public parkland. As this requirement would not be met with onsite recreation facilities, Madonna

Froom Ranch residents would contribute to increased rates of physical deterioration of existing facilities and the need for additional recreational facilities to adequately serve this population consistent with City policy.

In total, the Project would increase demand for recreation area and amenities from an increase in 1,138 residents (discounting 93 assisted living residents that would be served by onsite amenities provided by Villaggio). This residential population increase would require an additional 11.38 acres of public parkland with 5.69 acres dedicated as neighborhood park, consistent with General Plan PRE Policies 3.13.1, 3.15.1, and 5.0.2. A portion of the total requirement for parkland would be satisfied by the 2.9-acre public park proposed within Madonna Froom Ranch, leaving an unmet requirement of 8.48 acres of parkland with at least 2.79 acres of dedicated neighborhood park area. Without this required parkland, the Project's residents would substantially increase demand and use of recreation facilities in the City, contributing to accelerated deterioration and need for maintenance of existing recreation areas and facilities. Therefore, the Project would result in a *potentially significant* impact to recreational facilities.

This EIR evaluates maximum build-out potential under the FRSP; ultimate development within the Specific Plan area and associated populations may fall below levels analyzed in this EIR. Because the exact number of units and residents that will ultimately populate the Specific Plan area is currently unknown, mitigation has been identified to ensure development under the Specific Plan is consistent with General Plan PRE policies.

#### Mitigation Measures

*MM PS-1      **Public Parkland Requirements for Villaggio.** Mitigation shall be calculated based on actual buildout populations within Madonna Froom Ranch. At the discretion of the Community Development Department and City of San Luis Obispo Parks and Recreation Department, and to ensure that parkland would satisfy the needs of the proposed population of Villaggio, the Applicant shall either:*

- a. Identify, purchase, and develop up to 7.32 acres of parkland, including 2.79 acres of neighborhood park (in addition to the 2.9 acres of public parkland proposed by the Project), within the City's Sphere of Influence, consistent with City General Plan PRE Policies 3.13.1, 3.15.1, 5.0.1, and 5.0.2. If feasible, land for development of*

*neighborhood park space should be identified within interior areas of the City Sphere of Influence to maximize use and access; or*

- b. Provide a contribution of fees in-lieu of dedication of parkland, restricted solely for parkland acquisition and improvement.*

**Plan Requirements and Timing.** The development of parkland and/or dedication of fees shall be completed by the Applicant prior to issuance of building permits. While coordinating with the City Parks and Recreation Department, the Applicant shall modify the FRSP to demonstrate the provision of recreational facilities to meet the demand of Villaggio residents if an onsite option is selected.

**Monitoring.** The City shall ensure compliance with General Plan PRE Policies 3.13.1, 3.15.1, 5.0.1, and 5.0.2, and shall ensure the above measure is implemented prior issuance of building permits.

MM PS-2

***Public Parkland Requirements for Madonna Froom Ranch.*** *The Applicant shall identify, designate, dedicate, and/or develop up to 1.16 acres of public parkland into the Froom Ranch Specific Plan to be operational at the time of buildout of the Project, in addition to parkland required under MM PS-1. Mitigation shall be calculated based on actual buildout populations within Madonna Froom Ranch and may be implemented using one of the following options, at the discretion of the Community Development Department and City Parks and Recreation Department:*

- a. The Applicant shall designate an additional area of up to 1.16 acres of public facilities land use with the intention of providing parkland, within the Specific Plan area, consistent with City General Plan PRE Policies 3.13.1, 3.15.1, 5.0.1, and 5.0.2, or*
- b. The Applicant shall identify and purchase or dedicate up to 1.16 acres of parkland within the City's Sphere of Influence, or*
- c. The Applicant shall provide a contribution of fees in-lieu of dedication of up to 1.16 acres of parkland, restricted solely for parkland acquisition and improvement.*



**Plan Requirements and Timing.** The development of parkland and/or dedication of fees shall be completed by the Applicant prior to issuance of building permits. While coordinating with the City Parks and Recreation Department, the Applicant shall modify the FRSP to demonstrate the provision of recreational facilities to meet the demand of Madonna Froom Ranch residents if an onsite option is selected.

**Monitoring.** The City shall ensure compliance with General Plan PRE Policies 3.13.1, 3.13.1, 5.0.1, and 5.0.2, and shall ensure the above measure is implemented prior to issuance of building permits.

### Residual Impacts

With the implementation of MM PS-1, the Project would ensure that adequate recreational resources exist within the City to serve the additional demands generated by the proposed residential population of Villaggio following Project implementation. This would ensure that in aggregate, ten acres per 1,000 independent-living senior residents would be provided in park and recreational improvements and/or payment of fees would occur to meet the standards of the City Parks and Recreation Department as well as the requirements of Policies 3.13.1, 3.15.1, 5.0.1, and 5.0.2 within the General Plan PRE. With the implementation of MM PS-2, the Project would provide either the dedication of needed parkland or proportionate in-lieu fees to the City for public park space or community facilities for the Madonna Froom Ranch residential population. This dedication of parkland or payment of in-lieu fees for additional parkland would ensure the Project meets City requirements for the development of parkland and offsets the Project's demand on parks and recreational facilities. In addition, provision of this parkland would help alleviate overuse of any existing recreational facilities within the City or surrounding County areas, such that use of such facilities by new residents of the Project would not result in substantial physical deterioration of existing facilities. Provision and development of additional offsite parkland may have secondary environmental effects that would be subject to separate environmental review and approvals. Therefore, the Project site would result in impacts to parks that are *less than significant with mitigation*.

#### 3.12.3.4 Cumulative Impacts

Public services within the Project vicinity are primarily provided by the City, supplemented by interagency mutual aid agreements between SLOFD and CALFIRE for fire protection services and a Memorandum of Understanding between SLOPD, the County Sheriff's

Department, and Cal Poly's California State University (CSU)-operated University Police Department. Cumulative impacts to public services are largely related to citywide population growth. Please refer to Section 3.11, *Population and Housing* for a detailed growth forecast.

In addition to resident population growth, new employment associated with commercial, retail, and recreational uses would increase daytime populations and visitation with associated demand for public services and recreational facilities. 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 cumulatively increasing demand for the City's public services and recreational facilities.

The Project, in conjunction with approved, pending, or proposed development projects in the City, proposed land use changes under the LUCE Update, and 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 and recreation is described below.

#### *Police Protection*

New development proposed as part of the Project 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 conflict with General Plan goals for available-time for patrol response.

Existing SLOPD staffing levels exceed the officer per 1,000 resident ratio. Per the LUCE Update EIR, if no additional police officers were hired by the City's General Plan buildout year of 2035 (projected resident population of 56,686), cumulative growth and increased population would decrease the officers-to population ratio in the City from the ratio of 1.30 to a ratio of 1.06. To meet increased demand for police protection services and maintain 30 percent available time objective, SLOPD may be required to hire additional law enforcement officers. Though the Project would not individually result in the demand for any new officers due to its associated incremental increase in demand for service and existing sufficiency of services, the Project, in addition to all cumulative development within the City, would contribute to the 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 SLOPD to determine whether any increases in police resources and equipment is 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. Though not directly attributed to an increase in demand for services, the new or replaced police station that was identified as important by City voters due to the age of the existing facility is anticipated to be completed in the near future and may also help to accommodate these future cumulative demands. Therefore, the Project's contribution towards cumulative impacts would be *less than significant* for police services.

#### *Fire Protection*

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 the Project would be adequately served by existing fire protection facilities and services, the Project's contribution to cumulative impacts would not be considerable. However, as several future developments in the City would be located in the vicinity of the Project, including the Avila Ranch Development Plan and the San Luis Ranch Specific Plan, additional demands would be placed on the SLOFD and the mutual aid agreement with CALFIRE. As indicated by the 2016 Fire Department Master Plan, a fifth fire station in the southern portion of the City would be required to maintain adequate fire protection services within the City under buildout of the LUCE Update (SLOFD 2016). Upon development of the fifth fire station, cumulative impacts to fire protection services on the southern side of the City would continue to be less than significant. Further, an Interim Fire Station is planned under the approved Avila Ranch Development Plan and would provide fire protection services within the southern extent of the City until the fifth fire station becomes operational. Therefore, the Project would not result in a cumulatively considerable contribution to impacts to fire protection services and cumulative impacts would be *less than significant*.

#### *Schools*

Per the LUCE Update EIR, the total estimated enrollment generation that would result from LUE 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 37 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 site. Thus, the Project and other projected growth in the City would contribute incrementally to increased enrollment demands within the SLCUSD.

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 in the form of development fees (\$3.79 per square foot of residential development and \$0.61 per square foot of commercial development) is assessed with issuance of construction permits. School district fees are collected by the City and used by the district to fund school infrastructure needs (SLCUSD 2018). Given the payment of developer fees for school facilities under the Project (which constitutes full mitigation pursuant to SB 50), the Project's contribution to cumulative impacts would not be considerable and potential cumulative impacts would be *less than significant*.

#### *Parks and Recreation*

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

The General Plan PRE requires that neighborhood and community park facilities be provided at a ratio of ten acres of parkland per 1,000 persons. Under existing conditions, the City Parks and Recreation Department maintains a total of 28 parks and sports facilities, 10 designated Natural Reserves and open spaces, two bike trails, and landscape areas totaling approximately 206 acres to support the current estimated City population of 46,802 (City of San Luis Obispo 2019). This equates to 4.4 acres per 1,000 residents, which is significantly less than what is required under City standards. The future population of 56,868 individuals as projected under development of land uses permitted under the LUE would require a projected need of approximately 363 acres of additional parkland. However, with the implementation of MM PS-1 and PS-2, the Project would not result in a considerable contribution to cumulatively considerable impacts as the Project would mitigate its potential impact and provide adequate parkland consistent with City standards along with payment of development impact fees to accommodate the recreational needs of

future Project residents. Further, other projects in the area, such as the San Luis Ranch Specific Plan and Avila Ranch Development Plan projects, would also be contributing additional parkland for the City to support the associated population increases in each area. Ultimately, the Project would not result in cumulatively considerable deterioration of existing facilities or service levels and this impact would be *less than significant with mitigation*.