
Public Services and Recreation

This chapter describes existing conditions and the regulatory setting related to public services and utilities, including police protection, fire protection, schools, and parks and recreation, and the potential environmental impacts of the Specific Plan. Emergency response and emergency evacuation are addressed in Chapter 4.5, Hazards and Hazardous Materials, of this EIR.

Physical Setting

Fire Protection

The Oakland Fire Department (OFD) provides fire protection (prevention and suppression), and local emergency response (rescue, hazardous materials response, and first responder emergency medical services) services to the West Oakland Planning Area and vicinity. The Alameda County Medical Services District contracts with American Medical Response Ambulance Company and OFD to respond to medical emergencies. In addition to firefighting and emergency medical response capabilities, the OFD also has a Hazardous Materials Unit that operates from Station 3 in West Oakland and responds citywide to emergencies involving hazardous materials.¹ The OFD is a part of the State of California Master Mutual Aid agreement where OFD provides mutual aid to other cities and communities throughout the state.²

Facilities and Staffing

The OFD is organized into four divisions and three battalions that provide requested fire and emergency medical services. Battalion 2 serves West Oakland and North Oakland.

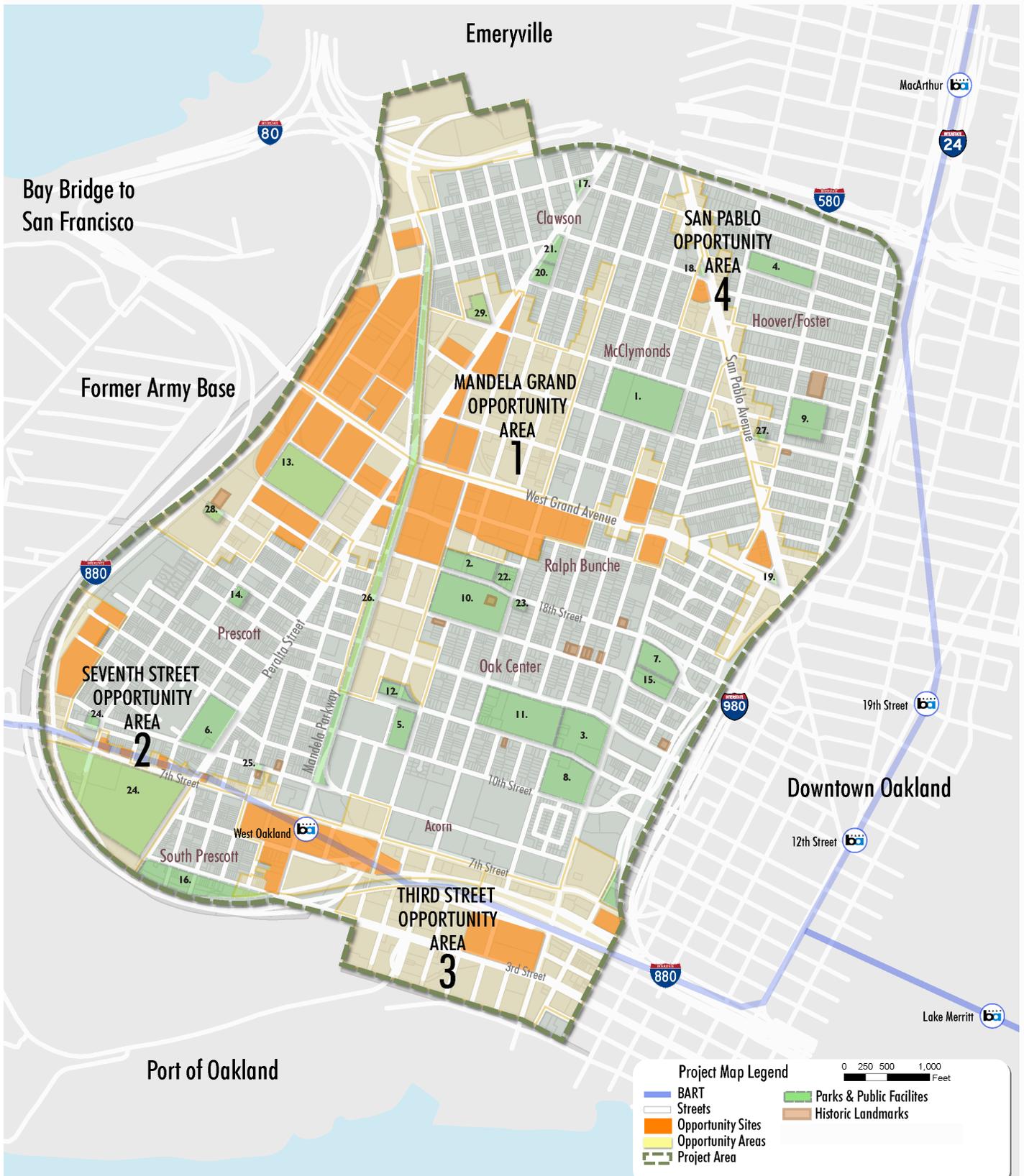
The OFD operates 25 fire stations. There are two fire stations within the West Oakland Planning Area (see **Figure 4.9-1**):

- Fire Station 3, located at 1445 14th Street at Mandela Parkway. Station 3 is staffed daily by eight firefighters, two of which are paramedics and the remaining emergency response technicians (EMT). Station 3 has an engine and truck for fire suppression, and houses OFD's primary hazardous materials incident response team.
- Fire Station 5, located at 934 34th Street at San Pablo Avenue.³ Station 5 is staffed daily by four fire fighters (one paramedic and three EMTs) and has one engine, and Station 1 is staffed daily with nine firefighters (two paramedics and seven EMTs) and has one engine and one truck.

¹ Oakland Fire Department, Website, <http://www.oaklandnet.com/fire/>, accessed July 26, 2012.

² City of Oakland, 2012 Oakland Army Base Project Initial Study/Addendum, May 2012.

³ Oakland Fire Department, Map of Oakland California Fire Stations, available online at <http://www.wv6or.com/OAKFIRE.HTM>, accessed July 26, 2012.



Source: JRDV Intl.

Figure 4.9-1
West Oakland Public Facilities



In addition, Station 1 and Station 15 are located just outside the Planning Area at 1605 Martin Luther King Way, and at 455 27th Street, respectively.

The OFD maintains 24 engine companies with approximately 4 personnel per engine, 4 truck companies with 4 personnel per truck, and 3 truck companies with 5 personnel per truck. Total Operations Division staffing consists of 500 uniformed personnel. The actual number of assigned personnel per station depends on the needs of that station. All personnel are trained as Paramedics or Emergency Medical Technicians.⁴ Station 3 is staffed by highly trained hazardous materials specialists and technicians.⁵

Beginning in July 2012, OFD stations will be closed for several consecutive days on a rotating basis, in order to respond to a budgetary shortfall citywide.

Service Demand and Response Times

The OFD Dispatch Center is located in downtown Oakland and is responsible for fire and medical emergency coordination and response. In 2011, the Dispatch Center received approximately 62,659 calls for response of which 81 percent were medical emergencies.⁶ The OFD's response time goal is 7 minutes, 90 percent of the time. Currently, the OFD's average citywide response time is 7 minutes, 86 percent of the time.⁷

Police Protection

The Oakland Police Department (OPD) provides police services throughout the city. The Port of Oakland obtains City services, including police protection, through annual payments to the City. The Port also provides private security at its truck parking facility.

Facilities and Staffing

The OPD is headquartered at 455 7th Street in Downtown Oakland. The OPD also operates from the Eastmont Substation at 73rd and Bancroft Avenues.

The OPD has approximately 660 sworn police officers, approximately 297 support staff, and 10 reserve officers.⁸ The OPD has reduced its staffing level from last year by approximately 60 sworn police officers and currently anticipates a monthly reduction of 4 sworn police officers until January 2013. After this date, the OPD plans to hire approximately 35 sworn police officers.⁹

The OPD has geographically divided the City into 3 command areas, 57 community policing beats and 35 patrol beats. The beats located within the West Oakland Planning Area are 02X, 02Y, 05X, 05Y, 06X and 07X.¹⁰ Neighborhood service coordinators are civilian employees who serve as a liaison between the community and the Police Department, and work with residents, businesses, schools, and other

⁴ Oakland Fire Department, Website, <http://www.oaklandnet.com/fire/>, accessed July 26, 2012.

⁵ Oakland, City of, 2009. Oakland Fire Department (OFD), *Special Operations*. Website: www.oaklandnet.com/fire/operations/special_operations.asp, accessed July 26, 2012.

⁶ City of Oakland, 2012 Oakland Army Base Project Initial Study/Addendum, May 2012.

⁷ Oakland Fire Department, Website, <http://www.oaklandnet.com/fire/>, accessed July 26, 2012.

⁸ City of Oakland, 2012 Oakland Army Base Project Initial Study/Addendum, May 2012.

⁹ City of Oakland, 2012 Oakland Army Base Project Initial Study/Addendum, May 2012.

¹⁰ Oakland Police Department, Police Service Areas & Beats, July 26, 2012.

institutions to set priorities and develop strategies to improve public safety and reduce crime. Each neighborhood service coordinator handles multiple patrol beats.

In accordance with a memorandum of understanding between the City and the Port of Oakland, the Port funds 2 full-time OPD officers to enforce truck-related regulations in West Oakland.¹¹

In August 2010, OPD released a working draft of its Strategic Plan, which outlines ways in which OPD plans to provide service to the City's residential and employee population, in the context of a high workload and budget constraints. The Strategic Plan identifies several ways to increase the efficiency of OPD through the expansion of partnerships with other law enforcement agencies; the use of more sophisticated intelligence-gathering mechanisms; and upgrading critical Police Department facilities. The Strategic Plan would enable OPD to more effectively serve cumulative development without the immediate need to develop more OPD facilities. The Strategic Plan also includes a facilities master plan that is based on the likely future organizational structure and staffing of the OPD, an inventory of future facility needs, and potential facility configuration, cost estimates, and potential development schedule, including the potential for further decentralization of police operations and facilities.¹²

Service Demand and Response Times

All emergency (911) and non-emergency calls for police services are received through OPD communications center located at 1701 Edgewater Drive. Calls for fire and medical services are routed to the OFD for dispatching. Priorities for responding to police calls are set by a computer-aided dispatch system that may be overridden by dispatchers. Police officers are dispatched from the police communications center by radio and/or laptop computers mounted in police vehicles.

Police response times generally reflect the perceived seriousness of the call. The OPD ranks incoming calls for police services as follows: Priority 1 means imminent danger of death or serious injury, felonies in progress, or serious public health hazards; Priority 2 refers to disputes with potential for violence, misdemeanor crimes in progress, stolen vehicle reports, and similar matters; and Priority 3 calls are reports of incidents that do not present danger to life or property. The City maintains a police response time goal of 5 minutes for Priority 1 calls, between 10 and 15 minutes for Priority 2 calls, and 30 minutes for Priority 3 calls.

Police response times to calls for police services are recorded for the city as a whole; the OPD does not track response times for individual service areas. In 2011, citywide average response times for Priority 1, 2, and 3 calls were 10.4 minutes, 22.8 minutes, and 23.5 minutes, respectively. These response times did not meet City goals.

Crime Rates

There were 1,592 violent crimes, including 252 shootings and 24.5 homicides per 100,000 population in Oakland in 2009. Generally, the more dense neighborhoods between I-880 and I-580, including West Oakland, report higher rates of violent crimes than areas north of I-580.¹³

¹¹ City of Oakland, 2012 Oakland Army Base Project Initial Study/Addendum, May 2012.

¹² Oakland, City of, 2010. Oakland Police Department (OPD). Strategic Plan, Working Draft. August. Website: www2.oaklandnet.com/oakca/groups/police/documents/webcontent/dowd022061.pdf (accessed February 3, 2012).

¹³ Oakland Police Department, *Strategic Plan Working Draft*, August 2010.

West Oakland has historically had high crime rates, both violent crimes against persons and property crimes. West Oakland had a much higher murder rate, almost four times higher than the city's and 16 times higher than the state in 2010. Rates of robbery and aggravated assault, the most common violent crimes, were twice as high in West Oakland in 2010 than in the city, and between six and eight times higher than the state. For property crimes (burglary, larceny, vehicle theft, and arson), West Oakland had a rate in 2010 more than 20 percent higher than the city's and 1.5 times higher than the state.¹⁴

West Oakland's poor reputation for high crime, gangs and drug-related activity are a serious impediment to the quality of life for existing residents and a barrier to attracting new residents and employers to the area. Oakland police officers interviewed for this report state that most violent crimes against people are committed against victims who are themselves involved in criminal activity. Over the past five years, the increased police presence at the request of new area residents has helped reduce crime in certain pockets of West Oakland. However crime remains both a perceptual and actual problem for current and prospective residents. It is unlikely that the vision of the Specific Plan can be realized without significant public safety improvements to the area.¹⁵

BART Police Department

The BART Police Department is comprised of 296 personnel, of which 206 are sworn peace officers. The BART PD is responsible for securing BART's heavy rail system, parking lots and facilities. Security for the bus system that interfaces with the BART system is handled jointly by the BART PD and local jurisdictions. Criminal investigations for crimes occurring on buses at BART stations are handled by the BART PD. Auto theft and auto burglary continues to be the most frequently occurring crimes addressed by the BART PD.

Schools

The Oakland Unified School District (OUSD) operates the public school system in the City of Oakland. The OUSD administers 77 elementary schools, 19 middle schools, one junior high school, 31 high schools, and two K-12 schools. It is also responsible for three alternative schools, two special education schools, three continuation schools, three community day schools, and one opportunity schools.¹⁶ The District's overall enrollment peaked in 1999 at 55,000, dropped to 39,000 by 2007, and is continuing to decline. Declining enrollment is projected to continue.¹⁷

The OUSD divides the city into three regional zones to manage resources. The Planning Area is located within Region 1. There are 22 elementary schools, seven middle schools and one K-8 school within

¹⁴ Conley Consulting group, West Oakland Specific Plan Market Opportunity: Housing, Retail and Arts, Oakland, California, December 2011, pp. 53 and 54.

¹⁵ Conley Consulting group, West Oakland Specific Plan Market Opportunity: Housing, Retail and Arts, Oakland, California, December 2011, pp. 55 and 56.

¹⁶ Ed-data, 2010.

¹⁷ Oakland Unified School District (OUSD), *Multi-Year Fiscal Recovery Plan*, 2005; Oakland Unified School District (OUSD), *Our Challenges and Goals*, available online at: <http://publicportal.ousd.k12.ca.us/199410102104342143/site/default.asp?>, 2012.

Region 1.¹⁸ OUSD has four elementary schools, two middle schools and one high school in West Oakland (Figure 4.9-1):

- McClymonds High School at 2607 Myrtle Street has approximately 254 students. McClymonds is a highly valued resource in West Oakland since it is the only full-sized public high school in Region 1.
- Ralph Bunche Middle School at 1240 18th Street has approximately 252 students.
- Lowell Middle School at 991 14th Street has approximately 265 students and houses the West Oakland Middle School and Kipp Bridge Charter Academy.
- Hoover Elementary School at 890 Brockhurst Street has approximately 328 students.
- Lafayette Elementary School at 1700 Market Street has approximately 300 students.
- Martin Luther King, Jr. Elementary School at 960 10th Street has approximately 350 students.
- Prescott Elementary School at 920 Campbell Street, now known as Preparatory Literary Academy of Cultural Excellence (PLACE) @ Prescott, had 208 students during the 2010-2011 school year.

Cole Middle School at 1011 Union Street, originally an elementary school, is currently an administrative facility and the headquarters of the OUSD police unit. Foster Elementary School at 2850 West Street is not presently used as a school and contains OUSD administrative functions, and OUSD anticipates planning/design renovation to house a new central kitchen facility and small urban farm.

OUSD charter schools in West Oakland include: Oakland Charter High School (Grades 9-12) located at 345 12th Street, KIPP Bridge Charter School (Grades 5-8) located at 991 14th Street, Oakland School of the Arts (Grades 6-8) located at 530 18th Street, and the American Indian Public Charter School II (Grades 6-8) located at 171 12th Street.

The OUSD has well known financial problems which are in part related to decreased per capita state funding due to poor attendance. West Oakland schools include some of the poorest performing schools in the city. Poor schools are a deterrent to potential new residents with children and a significant problem for existing families. The OUSD recently announced that it plans to close underutilized school sites based on factors that include performance and enrollment trends. Given the current fiscal dilemma of the OUSD, and the low enrollment and past performance of the West Oakland schools, there is a potential that one or more of the schools in West Oakland could be closed in the near future. While West Oakland residents are working to improve area schools, prospective families with children will not view local schools as a motivation to move to the area.

As authorized by California Government Code Sections 65995, 65996(a) and 65996(b), the OUSD collects school impact fees from developers of new residential and non-residential building space. The City imposes this fee through building permits. The impact fee revenue is used together with other district funds (e.g., state grants, general obligation bonds) to complete capital improvements. The amount of the fee is established through the district's Developer Fee Justification Study.

¹⁸ Oakland Unified School District (OUSD), School Sites by Region or Network w/Site Number, available online at: http://publicportal.ousd.k12.ca.us/ousd/lib/ousd/_shared/2010-11SchoolSitesbyRegionasof8.2.10-2.pdf, accessed July 18, 2012.

Parks and Recreation

Parks and recreation services within the City of Oakland are provided by the City of Oakland Office of Parks and Recreation (OPR) and the East Bay Regional Park District (EBRPD). OPR manages the City's parks and recreation centers. The EBRPD, although responsible primarily for acquiring and developing regional parks, open spaces, and regional trails throughout the East Bay, also provides open space and recreational facilities within Oakland's city limits.

City of Oakland Office of Parks and Recreation

OPR parks in West Oakland include Brush Street, Bertha Port, Crescent, Cypress Freeway Memorial, DeFremery, Durant, Fitzgerald, Grove Shafter, Lowell, Marston Campbell, McClymonds, Poplar, Raimondi, South Prescott, Saint Andrews Plaza, Union Plaza, Wade Johnson, Willow Street, Wood Street Pocket Park, and 25th Street (**Figure 4.9-1**). Other nearby parks outside the area also serve West Oakland residents, notably Middle Harbor Park and Portview Park in the Port of Oakland.¹⁹

OPR also operates several community recreation centers that offer sports, arts and crafts, culture arts and dance, computer labs, drama, mentoring, general learning, and afterschool activities. Recreation centers in West Oakland include DeFremery Recreation Center, West Oakland Senior Center, and Willie Keyes Community Center.²⁰

The City of Oakland General Plan establishes a parkland standard of 4 acres per 1,000 residents (for parks that meet the active recreational needs of the community as opposed to passive recreational open space). Oakland provides 1.33 acres of local serving park acreage per 1,000 residents, which falls short of the General Plan parkland standard.²¹

According to the City of Oakland General Plan Open Space, Conservation and Recreation (OSCAR) Element, West Oakland has 56.70 acres of parkland, including schoolyards and athletic fields, which equates to 2.43 acres of parkland per 1,000 residents, or 60 percent of the General Plan parkland standard. Despite this deficiency, West Oakland has more parkland than any other flatland neighborhood in Oakland.²²

East Bay Regional Park District

EBRPD manages over 73,000 acres of parkland in 47 East Bay parks. These parks complement those provided by the City of Oakland by providing larger park areas, more isolated and wild settings, and an emphasis on naturalist activities as opposed to active recreation. EBRPD parks in Oakland include the 271-acre Leona Canyon Regional Open Space Preserve, the 1,220-acre Martin Luther King, Jr. Regional Shoreline Park, the 660-acre Robert Sibley Volcanic Regional Preserve, and the 100-acre Roberts Regional Recreational Area.²³ Five additional parks are located immediately to the east, outside the City limits. There are no EBRPD parks in West Oakland.

¹⁹ City of Oakland, Office of Parks and Recreation, website, <http://www2.oaklandnet.com/Government/o/opr/s/Parks/index.htm>, accessed July 31, 2012.

²⁰ City of Oakland, Office of Parks and Recreation, website, <http://www2.oaklandnet.com/Government/o/opr/s/facility/index.htm>, accessed July 31, 2012.

²¹ City of Oakland, City of Oakland General Plan Open Space, Conservation and Recreation Element, 1996, page 4-9.

²² City of Oakland, City of Oakland General Plan Open Space, Conservation and Recreation (OSCAR) Element, 1994, p. 5-6.

²³ Trust for Public Land and Center for Park Excellence, 2010 City Park Facts, 2010.

Proposed Gateway Park

Gateway Park is proposed to be a 225-acre waterfront park at the foot of the east span of the Bay Bridge that builds upon the pedestrian and bicycle access on the new east span of the bridge, and provides a variety of trails, a boardwalk, a baywalk, a transportation museum and surrounding green area, monumental public art, bridge artifacts, a children's play area, active recreation areas, and connections to surrounding communities and other parks and open space. Gateway Park is being planned by the Gateway Park Working Group, an alliance of nine local, regional, and state agencies that includes the City of Oakland and the Port of Oakland.²⁴

Development of the entire 225-acre park is proposed to take place in two distinct phases. Phase 1 focuses on the park's western end at the foot of the east span of the Bay Bridge, and is the focus of the planning effort and associated environmental review document currently underway. Phase 1A, identified as a construction priority, proposes a new elevated/bike path adjacent to West Grand Avenue that would take visitors safely over the railroad and Port industrial lands, and connect West Oakland to the park.

Phase 2 consists of The Maze/West Oakland area of the park, which takes advantage of the space beneath the maze of freeways adjacent to West Oakland. It proposes park and recreational improvements beneath and adjacent to the elevated segments of I-880 and the I-80/I-580/I-880 interchange. The Maze/West Oakland area of the park is proposed to provide areas for active recreation, such as basketball, tennis, skating and dog running as well as a wetland garden and dry garden that demonstrate water use and water management strategies. It is also proposed to include an overflow parking lot with 150 parking spaces. The level and scale of the amenities in this area is dependent upon the type of development that occurs in the surrounding area.

The Maze/West Oakland area of the park encompasses Opportunity Site #3 as identified in the West Oakland Specific Plan (16 acres east of I-880, west of Wood Street, and north of West Grand Avenue)/ The Specific Plan identifies this site for development of new employment or retail uses. **Figures 4.9-2** shows the planned Gateway Park improvements within and adjacent to the Planning Area.

San Francisco Bay Trail

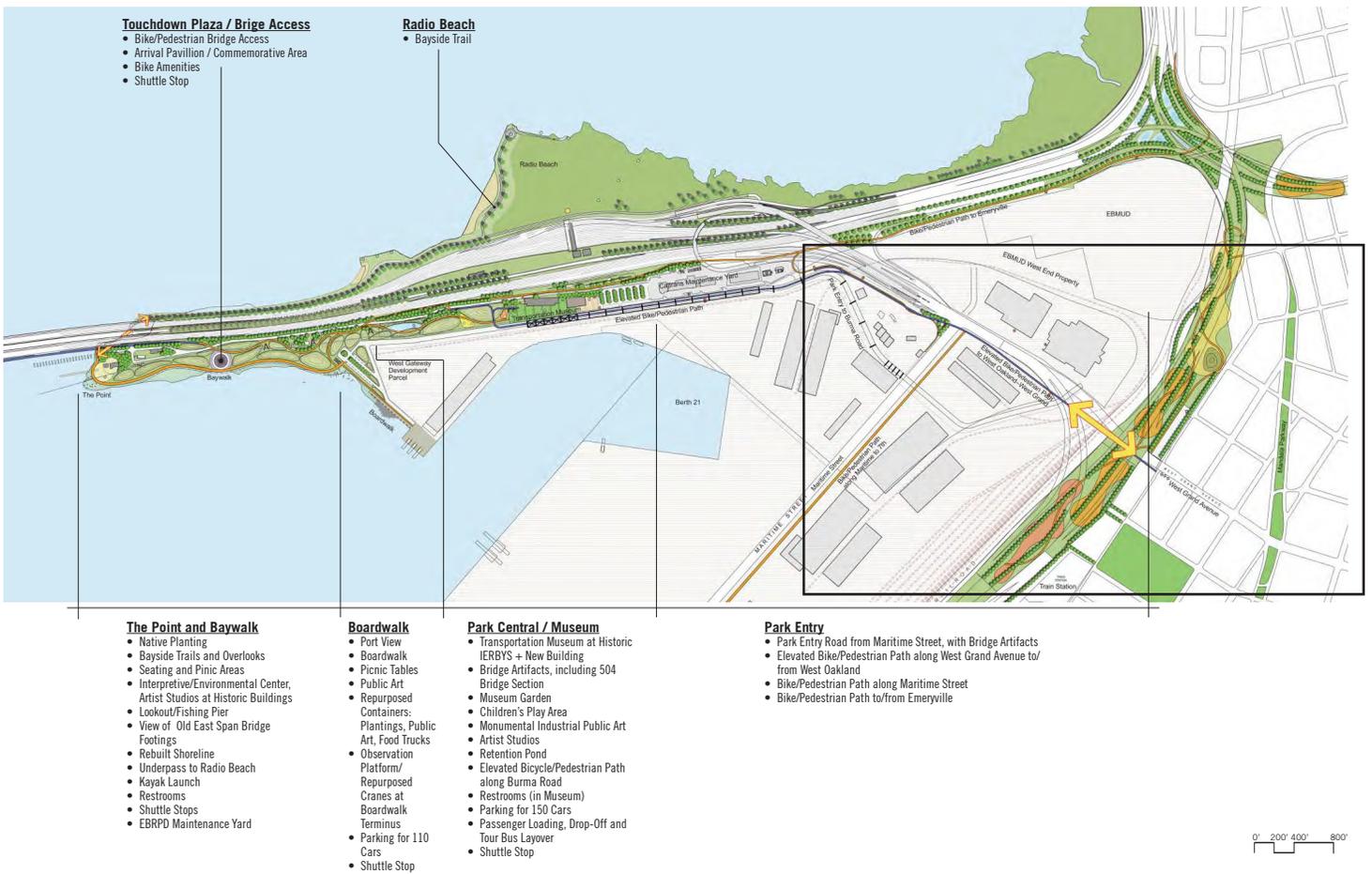
The San Francisco Bay Trail traverses the Planning Area. The main trail extends from Jack London Square to Emeryville via 2nd Street, 3rd Street and Mandela Parkway. Spur trails connect to Middle Harbor Park and Portview Park along 8th Street, 7th Street and Middle Harbor Road.

Urban Farms

There are a growing number of community gardens and urban farms in West Oakland. City Slicker Farms, a non-profit organization based in West Oakland, operates seven Community Market Farms (spaces open to the public), as well as a weekly Farm Stand, a greenhouse, Urban Farming Education programs, and over 100 Backyard Gardens. City Slicker Farms is constructing a new market farm at Fitzgerald Park and Union Plaza in partnership with OPR. City Slicker Farms was also recently awarded a \$4 million Proposition 84 grant for a "West Oakland Park and Urban Farm" project, to purchase a vacant lot at 28th Street and Peralta Streets and construct a farm and park there.²⁵

²⁴ Gateway Park Working Group, Gateway Park Project Concept Report, September 2012.

²⁵ City Slicker Farms, website, <http://www.cityslickerfarms.org/>, accessed July 31, 2012.



Source: Gateway Park Working Group, with Perkins & Will, June 7, 2012

Figure 4.9.2
Gateway Park Concept, Gateway Park Area
Project Study Report



Regulatory Setting

State of California

School Facilities Act of 1986

The California School Facilities Act of 1986 (AB 2926) authorizes entities to levy statutory fees on new residential and commercial/industrial development in order to pay for school facilities. AB 2926 was revised by the passage of AB 1600, which added Section 66000 *et seq.* of the Government Code.

California Government Code Sections 65995, 65996(a) and 65996(b)

The Leroy F. Greene School Facilities Act of 1998, or Senate Bill 50 (SB 50), codified as California Government Code Sections 65995, 65996(a) and 65996(b), authorizes school districts to levy developer fees to finance the construction or reconstruction of school facilities. The California State Legislature has determined that school impact fees shall be the exclusive method of mitigating the school facilities impacts of a project or plan, has set limits on school impact fees, and has determined that payment of school impact fees shall be deemed to provide full and complete school facilities mitigation. SB 50 foreclosed alternative methods such as "Mira" agreements or Mello-Roos districts for collecting the funds necessary to fully mitigate the impacts of new development on schools. SB 50 also prohibits local agencies such as the City of Oakland from denying land use approvals on the basis that school facilities are inadequate.

The State Allocation Board (SAB) maintains Level 1 Fees at \$0.47 per square foot of enclosed and covered space in any commercial or industrial development and \$2.97 per square foot for residential development.²⁶ These fees are intended to address the increased educational demands on the school district resulting from new development. Public school districts can, however, impose higher fees than those established by the SAB, provided they meet the conditions outlined by SB 50. Private schools are not eligible for fees collected.

*Oakland Unified School District: 2012 School Facility Fee Justification Report*²⁷

In February of 2013 the Oakland Unified School District (District) adopted a report justifying collection of higher fees, up to the legal maximum fee of \$3.20 per square foot of residential development as authorized by Government Code Section 65995 (Level I fees), and the legal maximum fee of \$0.51 per square foot of development on all categories of commercial/industrial development (except rental self-storage). The District's justification for collecting the maximum fees on future residential and commercial/industrial development is based, among other matters, on the substantial capital investments needed for classroom facilities, and the need to offset the ongoing capital facility improvements needed to support a Full Service Community School District that future residential and commercial/industrial development in the City is projected to create. The Fee Justification Report includes detailed information regarding the cost of providing school facilities for students generated by future residential and commercial/industrial development in order to justify the collection of fees on

²⁶ State Allocation Board (SAB) Meeting Actions, 2010 - Developer Fee Adjustment, available online at <http://www.cashnet.org/news/article.esiml?id=1368>, accessed July 20, 2012.

²⁷ Public Hearing and Adoption by the Board of Education of Resolution No.1213-0090 - Approving the School Facility Fee Justification Report for Residential, Commercial and Industrial Development Projects

those developments, and explains the relationship between the fees and the developments on which those fees are to be charged.

State Public Park Preservation Act

The primary instrument for protecting and preserving parkland is the State Public Park Preservation Act. Under the Public Resources Code, cities and counties may not acquire any real property that is in use as a public park for any non-park use unless compensation or land, or both, are provided to replace the parkland acquired. This provides for no net loss of parkland and facilities.

California Fire Code

The California Fire Code (Title 24, Part 9 of the California Code of Regulations) establishes regulations to safeguard against hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises. The provisions of the Fire Code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure throughout the State of California. The Fire Code includes regulations regarding fire-resistance-rated construction, fire protection systems such as alarm and sprinkler systems, fire services features such as fire apparatus access roads, means of egress, fire safety during construction and demolition, and wildland-urban interface areas.

Quimby Act

California Government Code Section 66477, Subdivision Map Act, referred to as the Quimby Act, permits local jurisdictions to require the dedication of land and/or the payment of in-lieu fees solely for park and recreation purposes. The dedication of land or in-lieu fees may be required for land or condominium subdivisions. The dedication of land or in-lieu fees is not to exceed the proportionate amount necessary to provide 3 acres of neighborhood and community parkland per 1,000 persons. Dedication requirements may be increased if the existing ratio of parkland per 1,000 persons at the time of adoption of a City's local park land dedication ordinance exceeds that ratio, but may not exceed 5 acres per 1,000 persons. Land dedicated and fees collected pursuant to the Quimby Act may only be used for developing new, or rehabilitating existing park or recreational facilities. The City of Oakland does not have a park land dedication requirement pursuant to the Quimby Act.

City of Oakland

City of Oakland General Plan

The following City of Oakland General Plan Land Use and Transportation Element policies are relevant to the public services impacts of the proposed Specific Plan:

Policy N.12.1: The development of public facilities and staffing of safety-related services, such as fire stations, should be sequenced and timed to provide a balance between land use and population growth, and public services at all times.

Policy N.12.2: Adequate public school capacity should be available to meet the needs of Oakland's growing community. The City and the Oakland Unified School District (OUSD) should work together to establish a continuing procedure for coordinating residential and commercial development and exploring the imposition of mutually agreed upon reasonable and feasible strategies to provide for adequate school capacity. The City and OUSD should jointly consider, where feasible and appropriate, funding mechanisms such as assessment districts,

redevelopment Agency funding (AB1290), uses of surplus City-owned land, bond issues, and adjacent or shared use of land or school facilities with recreation, libraries, child care and other public uses.

Policy N.12.5: In its capital improvement and public service programs, the City should give priority to reducing deficiencies in, and disparities between, existing residential areas.

Policy FI-1: Maintain and enhance the City's capacity for emergency response, fire prevention and fire fighting.

The following Open Space, Conservation and Recreation (OSCAR) Element policies are relevant to the parks and recreation impacts of the proposed Specific Plan:

Policy REC-3.1: Use level of service standards of 10 acres of total parkland and 4 acres of local-serving parkland as a means of determining where unmet needs exist and prioritizing future capital investments.

Policy REC-3.3: Consider a range of factors when locating new parks or recreational facilities, including local recreational needs, projected operating and maintenance costs, budgetary constraints, surrounding land uses, citizen wishes, accessibility, the need to protect or enhance a historic resource, and site visibility.

Policy REC-5.2: Safety-Oriented Design. Use a wide range of physical design solutions to improve safety at Oakland's parks, including lighting, signage, landscape design, fencing, vandal-resistant building materials, and emergency response features.

Policy REC-5.3: Law Enforcement. Improve law enforcement of Oakland's parks through a combination of new rangers, reserve officers, neighborhood watch groups, coordination with East Bay Regional Park District rangers, and better communication between enforcement officers and neighborhood residents.

Policy REC-5.4: Civic Responsibility. Promote civic responsibility among residents in the care of Oakland's parks and encourage broad community participation in making parks safer.

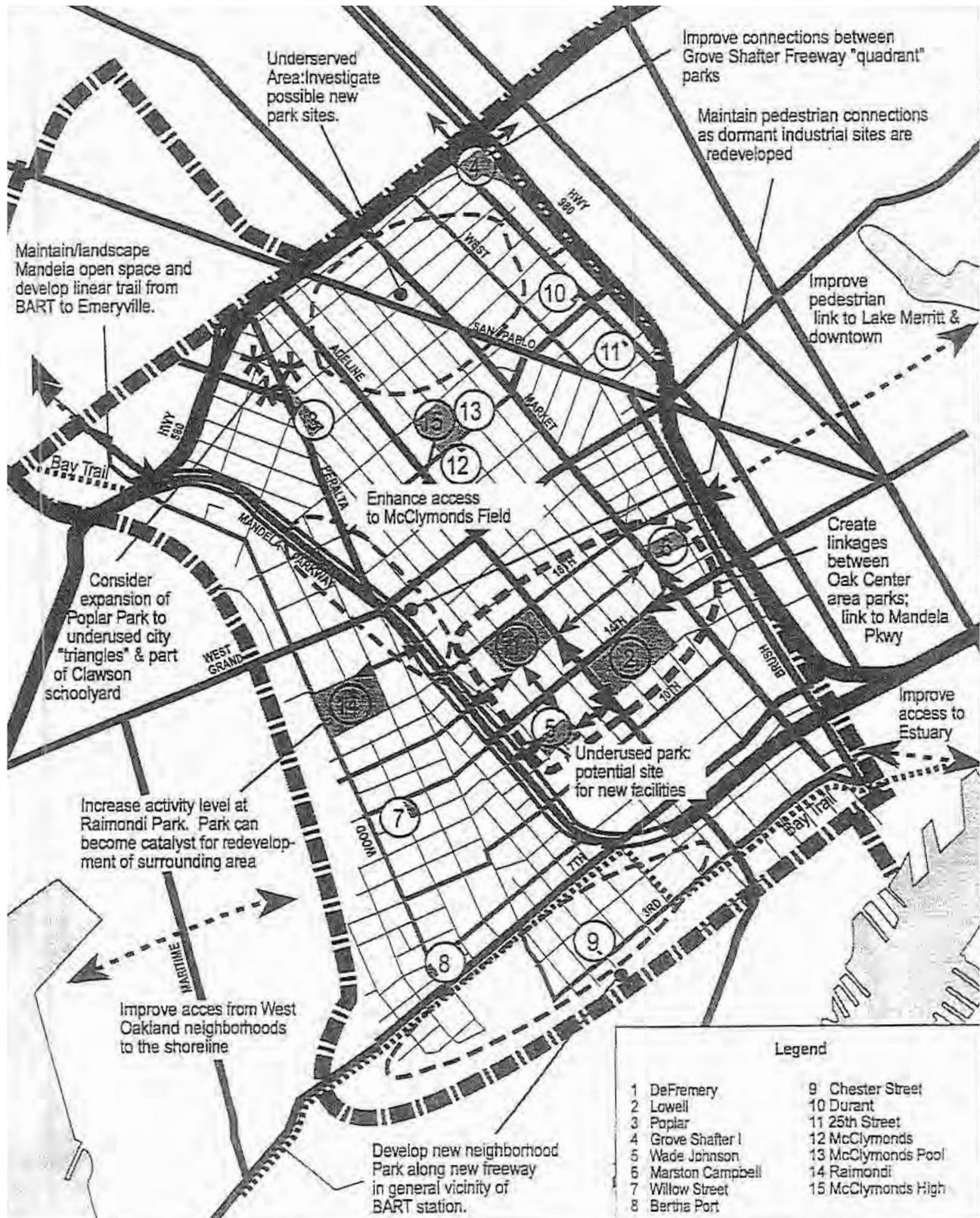
Policy REC-10.2: To the extent permitted by law, require recreational needs created by future growth to be offset by resources contributed by that growth. In other words, require mandatory land dedication for large-scale residential development and establish a park impact fee for smaller-scale residential development projects, including individual new dwelling units. Calculate the dedication or fee requirement based on a standard of 4 acres of local-serving parkland per 1,000 residents.

The OSCAR Element also contains the following principles relevant to the proposed Specific Plan:

- A park should be available within walking distance of every Oakland resident. No person should have to travel too far from home to gain access to recreational services.
- Recreation needs created by new development should be offset by resources contributed by that growth. In other words, new development should pay its fair share to meet the increased demand for parks resulting from that development.

Some of the key OSCAR Element recommendations for West Oakland are shown in **Figure 4.9-3**.²⁸

²⁸ City of Oakland, City of Oakland General Plan Open Space, Conservation and Recreation Element, 1996, pages 5-7 and 5-9.



Source: City of Oakland General Plan - Open Space, Conservation and Recreation Element

Figure 4.9-3
OSCAR Element Recommendations for
West Oakland



City of Oakland Violence Prevention Plan

The City's Violence Prevention Plan, first adopted in 1996 and updated in 2003, proposes prevention and intervention efforts that complement traditional policing and the criminal justice system. It focuses on areas that have been most prone to violent crime, and proposes multi-disciplinary strategies such as providing alternatives for youth, addressing family violence and sexual assault, establishing programs for offenders, reducing access to illegal guns, reducing the impacts of alcohol and drugs, and supporting community-building and problem-solving initiatives.

Standard Conditions of Approval

The City's Standard Conditions of Approval relevant to public services are listed below. These Standard Conditions of Approval would be adopted as mandatory requirements of each individual future project within the Planning Area when it is approved by the City and would avoid or reduce significant impacts related to public services and recreation. The Standard Conditions and Approval are incorporated and required as part of development in accordance with the Specific Plan, so they are not listed as mitigation measures. Where there are impacts associated with development in accordance with the Specific Plan that would result in significant environmental impacts despite implementation of the Standard Conditions of Approval, additional mitigation measures are recommended.

SCA 4: Conformance with other Requirements.

Prior to issuance of a demolition, grading, P-job, or other construction related permit

- a. The project applicant shall comply with all other applicable federal, state, regional and/or local laws/codes, requirements, regulations, and guidelines, including but not limited to those imposed by the City's Building Services Division, the City's Fire Marshal, and the City's Public Works Agency. Compliance with other applicable requirements may require changes to the approved use and/or plans. These changes shall be processed in accordance with the procedures contained in SCA 3, Scope of This Approval, Major and Minor Changes.
- b. The applicant shall submit approved building plans for project-specific needs related to fire protection to the Fire Services Division for review and approval, including, but not limited to automatic extinguishing systems, water supply improvements and hydrants, fire department access, and vegetation management for preventing fires and soil erosion.

SCA 5: Conformance to Approved Plans; Modification of Conditions or Revocation.

Ongoing

- a. Site shall be kept in a blight/nuisance-free condition. Any existing blight or nuisance shall be abated within 60-90 days of approval, unless an earlier date is specified elsewhere.
- b. The City of Oakland reserves the right at any time during construction to require certification by a licensed professional that the as-built project conforms to all applicable zoning requirements, including but not limited to approved maximum heights and minimum setbacks. Failure to construct the project in accordance with approved plans may result in remedial reconstruction, permit revocation, permit modification, stop work, permit suspension or other corrective action.
- c. Violation of any term, conditions/mitigation measures or project description relating to the Approvals is unlawful, prohibited, and a violation of the Oakland Municipal Code. The City of Oakland reserves the right to initiate civil and/or criminal enforcement and/or abatement proceedings, or after notice and public hearing, to revoke the Approvals or alter these conditions/mitigation measures if it is found that there is violation of any of the conditions/mitigation measures or the provisions of the Planning Code or Municipal Code, or the project operates as or causes a public nuisance. This provision is not intended to, nor does it, limit in any manner whatsoever the ability of the City to take appropriate enforcement actions. The project applicant shall be responsible for paying fees in

accordance with the City's Master Fee Schedule for inspections conducted by the City or a City-designated third-party to investigate alleged violations of the Conditions of Approval.

SCA 61: Site Review by the Fire Services Division.

Prior to the issuance of demolition, grading or building permit

The project applicant shall submit plans for site review and approval to the Fire Prevention Bureau Hazardous Materials Unit. Property owner may be required to obtain or perform a Phase II hazard assessment.

SCA 71: Fire Safety Phasing Plan.

Prior to issuance of a demolition, grading, and/or construction and concurrent with any p-job submittal permit

The project applicant shall submit a separate fire safety phasing plan to the Planning and Zoning Division and Fire Services Division for their review and approval. The fire safety plan shall include all of the fire safety features incorporated into the project and the schedule for implementation of the features. Fire Services Division may require changes to the plan or may reject the plan if it does not adequately address fire hazards associated with the project as a whole or the individual phase.

SCA 73: Fire Safety.

Prior to and ongoing throughout demolition, grading, and/or construction

The project applicant and construction contractor will ensure that during project construction, all construction vehicles and equipment will be fitted with spark arrestors to minimize accidental ignition of dry construction debris and surrounding dry vegetation.

Impacts, Standard Conditions of Approval and Mitigation Measures

Significance Criteria

According to the City's Thresholds of Significance, the Specific Plan would have a significant impact related to public services and recreation if it would:

1. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:
 - a. Fire protection;
 - b. Police protection;
 - c. Schools; or
 - d. Other public facilities;
2. Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
3. Include recreational facilities or require the construction or expansion of recreational facilities which might have a substantial adverse physical effect on the environment.

Methodology and Assumptions

This EIR addresses impacts to public services due to projected growth arising from land use changes resulting from the proposed Plan. The analysis considered existing public safety services, schools, and other community facilities, as well as current General Plan policies, City of Oakland SCA, and other applicable regulations. Plan buildout estimates and policies are compared with service levels to identify potential impacts.

Fire Protection

Impact PSR-1: Development under the Specific Plan would result in an increase in OFD service calls and a commensurate incremental need for additional staffing, equipment and facilities to maintain the City's response time goals and staffing ratios. Until the timing, location, size and characteristics of any associated facilities expansion needs can be identified, the environmental impacts related to such new facilities would be too speculative for evaluation. If and when any proposal for expanded or new OFD facilities is identified, it may require its own environmental review under CEQA. With implementation of the City's Standard Conditions of Approval, normal development review and permitting procedures, and building and fire code requirements, the impacts of the Specific Plan related to fire protection would be less than significant. **(LTS)**

The Specific Plan would provide for the development of up to an additional 5,090 net new housing units and 4,030,000 square feet of net new non-residential space within the Planning Area. This additional development would result in an estimated 11,136 new residents and 14,850 new jobs in the Planning Area by 2035. This additional development would result in an associated increase in service calls and a commensurate incremental need for additional staffing, equipment and facilities to maintain the City's response time goals and staffing ratios.

Development under the Specific Plan would be subject to the policies, regulations, standards and Standard Conditions of Approval of the City, including appropriate standards for emergency access roads, emergency water supply, and fire preparedness, capacity, and response. SCA 4, *Conformance with other Requirements*, requires building plans for development projects to be submitted to the OFD for review and approval. SCA 61, *Site Review by the Fire Services Division*, and SCA 71, *Fire Safety Phasing Plan*, also require OFD approval to ensure that project site design and fire safety features adequately address fire hazards. SCA 73, *Fire Safety*, requires spark arrestors on construction equipment to reduce the risk of construction-period fires. In addition, new developments may incorporate up-to-date fire protection features and technology (e.g., smoke alarms, interior sprinkling systems). The Specific Plan would also bring additional annual revenue to the City in the form of increased local property taxes and sales taxes that would help offset the increased demand for fire and emergency medical services by funding increases in firefighters, administrative personnel, training, and equipment.

With required implementation of the City's Standard Conditions of Approval, normal development review and permitting procedures, and building and fire code requirements, the impacts of the Specific Plan related to fire protection would be less than significant.

Until any specific facilities expansion needs can be identified in terms of timing, location, size and characteristics, assessment of associated environmental impacts would be too speculative for evaluation. If and when any proposal for expanded or new OFD facilities is identified by the City, it may require its own environmental review under CEQA.

Mitigation Measures

None required

Police Protection

Impact PSR-2: Development under the Specific Plan would result in an increase in OPD service calls and a commensurate incremental need for additional staffing, equipment and facilities to maintain the City's response time goals and staffing ratios. Until the timing, location, size and characteristics of any associated facilities expansion needs can be identified, the environmental impacts would be too speculative for evaluation. If and when any proposal for expanded or new OPD facilities is identified, it may require its own environmental review under CEQA. The Specific Plan may reduce crime by incorporating crime prevention through environmental design (CEPTD) principles and up-to-date security features and technology in new development, and by economic growth and revitalization, and increased employment and personal income. The impacts of the Specific Plan related to police protection would be less than significant. **(LTS)**

The Specific Plan would provide for the development of up to an additional 5,090 net new housing units and 4,030,000 square feet of net new non-residential space within the Opportunity Areas. This additional development would result in an estimated 11,136 new residents and 14,850 new jobs in the Planning Area by 2035. This additional population would result in an associated increase in service calls and a commensurate incremental need for additional staffing and equipment to maintain the City's police response time goals.

Development under the Specific Plan would result in an increase in service calls and a commensurate incremental need for additional staffing, equipment and facilities to maintain the City's response time goals and staffing ratios. Until the timing, location, size and characteristics of any associated facilities expansion needs can be identified, the environmental impacts would be too speculative for evaluation. If and when any proposal for expanded or new OPD facilities is identified, it would require its own environmental review under CEQA.

In addition, by revitalizing and activating the Planning Area, the Specific Plan may help reduce crime as more people are brought into the areas on a more constant basis, municipal services and infrastructure are upgraded, and newer developments incorporate crime prevention through environmental design (CEPTD) principles and up-to-date security features and technology. In addition, the potential economic growth and revitalization, and increased employment and personal income resulting from the Specific Plan may serve to reduce crime. The Specific Plan would bring additional annual revenue to the City in the form of increased local property taxes and sales taxes that would help offset the increased demand for police service by funding increases in police personnel, training, and equipment.

The impacts of the Specific Plan related to police protection would be less than significant.

Mitigation Measures

None required

Schools

Impact PSR-3: Development in accordance with the Specific Plan would generate additional students attending the Oakland Unified School District (OUSD) incrementally through 2035 or longer. The OUSD collects school impact fees from residential and non-residential development. Under

California Government Code Sections 65995, 65996(a) and 65996(b), payment of these fees is deemed to be full and complete mitigation. Therefore, the impact of the Specific Plan related to schools would be less than significant. **(LTS)**

The Specific Plan would provide for the development of up to an additional 5,090 net new housing units and 4,030,000 square feet of net new non-residential space within the Opportunity Areas. This additional development would result in an estimated 11,136 new residents and 14,850 new jobs in the Planning Area by 2035. This residential development would generate approximately 718 new elementary school students, 305 middle school students and 370 new high school students (a total of 1,395 students) attending the OUSD.

These new students would be added to district-wide enrollment through 2035 or longer. New students would be distributed among the schools serving OUSD Region 1, thereby reducing substantial enrollment impacts to any one school. Given the declining student enrollment in OUSD schools, the District is likely to have capacity within its existing facilities to accommodate new students generated by projects constructed pursuant to the Specific Plan. If classroom capacity within the specific schools serving the Planning Area were found to be unavailable at the time new students enter the school system, the OUSD could reassign students among schools within the District, expand year-round schooling, add more portable classrooms, transport students to less crowded schools, or find opportunities to more efficiently use existing or abandoned school facilities.

As authorized by California Government Code Sections 65995, 65996(a) and 65996(b), the OUSD collects school impact fees from developers of new residential and non-residential building space. The permitted method for addressing school enrollment increase impacts is limited to the statutory authority of school districts to impose school impact fees. California Government Code Sections 65995, 65996(a) and 65996(b) have preempted and limited the ability of local governments to exercise their police power to mitigate school impacts. A local government may not impose development requirements regarding school facilities in a manner inconsistent with state statutes on the subject. Therefore, under current statutes and case law, payment of the required school impact fees would address the impact of the Specific Plan on school services to the furthest extent permitted by law. School impact fees are collected when building permits are issued.

The courts have held that increased classroom enrollment resulting in school overcrowding is considered a "social" rather than a physical "environmental" impact and is not, in itself, a significant environmental impact requiring mitigation under CEQA (Goleta Union School District vs. Regents of University of California [2d Dist. 1995]). The duty of a lead agency to mitigate school impacts beyond the state-mandated fees arises only where there is a physical environmental impact involved beyond the mere addition of students to a school. Without definitive, detailed information on specific future school district facility expansion plans, such secondary physical environmental impacts would be too speculative to evaluate at this time.

The OUSD collects school impact fees from residential and non-residential development within the Planning Area. Under California Government Code Sections 65995, 65996(a) and 65996(b), payment of these fees is deemed to be full and complete mitigation. Therefore, the impact of the Specific Plan related to schools would be less than significant.

Mitigation Measures

None required

Parks and Recreation

Impact PSR-4: Development under the Specific Plan would generate a need for additional parkland, adding to the existing deficiency of parkland acreage, and would increase the use of existing parks and recreational facilities. No new public parks or recreational facilities are proposed as part of the Specific Plan. The increased demand would occur incrementally over the 25-year timeframe of the Specific Plan. Parks and recreational facilities may be required as part of new development projects and on-site useable open space or recreational facilities in new residential developments may offset some of the need. Parkland, recreational facilities and recreational trail links are proposed within and adjacent to the Planning Area as part of the planned Gateway Park. The Specific Plan would not be expected to increase the use of existing parks and recreational facilities such that substantial physical deterioration of such facilities may occur or be accelerated. Therefore, the parks and recreation impacts of the updated Specific Plan would be less than significant. **(LTS)**

The Specific Plan would provide for the development of up to an additional 5,090 net new housing units and 4,030,000 square feet of net new non-residential space within the Opportunity Areas. This additional development would result in an estimated 11,136 new residents and 14,850 new jobs in the Planning Area by 2035.

The new residents and workers resulting from the Specific Plan would generate a need for additional parkland and recreational facilities, which would occur incrementally over the timeframe of the Specific Plan. Using the City's adopted standard of 4 acres of active, local-serving parkland per 1,000 persons, this growth and development would generate an increased demand for approximately 44.5 acres of new parkland. The additional demand for parkland would add to the existing deficiency of parkland acreage in West Oakland, which would continue to fall short of the General Plan parkland acreage standard. The additional demand would also increase the use of existing parks or other recreational facilities.

Parks and recreational facilities may be required as part of new development projects. On-site useable open space as required by zoning or recreational facilities in some new residential developments may offset some of the need. The approved Wood Street Mixed Use Project, for example, includes 1.39 acres of public open space and 2.82 acres of private open space. The Specific Plan would also bring additional annual revenue to the City in the form of increased local property taxes and sales taxes that would help fund new or expanded parks and recreational facilities.

No new public parkland or recreational facilities are proposed as part of the Specific Plan. Preliminary plans for the proposed Gateway Park include recreational areas and trail links within and immediately adjacent to the Planning Area. The September 2012 Gateway Park Project Concept Report proposes active recreation areas in the Maze/West Oakland area of the park (the Specific Plan identifies this location for development of employment or retail uses) and a new elevated/bike path adjacent to West Grand Avenue that would connect West Oakland to the core waterfront areas of the park, and to bicycle and pedestrian access on the new East Span of the Bay Bridge. The Concept Report acknowledges that the level and scale of the amenities in this area is dependent upon the type of development that occurs in the surrounding area. With or without the proposed active recreation areas in the Maze/West Oakland area of the planned Gateway Park, the other recreational areas and trail links would make a substantial contribution toward meeting the existing parkland and recreational need in West Oakland as well as the need for additional parkland and recreational facilities caused by the Specific Plan.

Implementation of the Specific Plan goals and policies would also make important contributions to the community's parks and public realm environment. The Specific Plan calls for new private open space areas, landscaped corridors, pedestrian connections, and other enhancements of the public realm. The

Specific Plan policies are intended to ensure that community spaces throughout the Planning Area are designed to be welcoming to pedestrians and are well integrated with their surrounding neighborhoods. Temporary construction period traffic, noise, air quality, water quality, and other potential impacts associated with these public realm improvements are evaluated in this EIR and would be mitigated through the City's Standard Conditions of Approval and other regulations.

Mitigation Measures

None needed

Cumulative Impacts

Impact PSR-1: Cumulative development would contribute to an increase in calls for police and fire service, additional students attending the Oakland Unified School District (OUSD), and a need for additional parkland, and would increase the use of existing parks and recreational facilities such that substantial physical deterioration of such facilities may occur or be accelerated. Until any specific OFD and OPD facilities expansion needs can be identified in terms of timing, location, size and characteristics, assessment of associated environmental impacts would be too speculative for evaluation. With implementation of the City's Standard Conditions of Approval, normal development review and permitting procedures, and building and fire code requirements, cumulative impacts related to fire protection and police protection would be less than significant. Under California Government Code Sections 65995, 65996(a) and 65996(b), payment of school impact fees is deemed to be full and complete mitigation. Therefore, cumulative impacts related to schools would be less than significant. The cumulative impact on parks and recreational facilities may be significant. However, the increased demand would occur incrementally over the 25-year timeframe of the Specific Plan, on-site useable open space or recreational facilities in new residential developments may offset some of the need, and parkland, recreational facilities and recreational trail links will be provided within and adjacent to the Planning Area as part of the planned Gateway Park. Therefore, the Specific Plan would not be expected to increase the use of existing parks and recreational facilities such that substantial physical deterioration of such facilities may occur or be accelerated, and the contribution of the Specific Plan to the identified significant cumulative impact on parks and recreational facilities would be less than considerable and thus less than significant. **(LTS)**

West Oakland Planning Area

Development facilitated by the Specific Plan, together with other projected development throughout West Oakland, would result in the development of up to an additional 5,090 housing units within West Oakland Specific Plan Opportunity Areas, and 1,755 new housing units throughout the remainder of West Oakland, for a total of 6,845 new West Oakland housing units. It would also result in the creation of 16,500 new jobs within West Oakland Specific Plan Opportunity Areas, and approximately 2,000 new jobs throughout the remainder of West Oakland, for a total of 18,500 new West Oakland jobs (see Chapter 4.8: Population and Housing).

Fire Protection and Police Protection

Cumulative development throughout West Oakland would contribute to an increase in calls for police and fire service and a commensurate incremental need for additional staffing, equipment and facilities to maintain response time goals and staffing ratios.

Development under the Specific Plan would be subject to the policies, regulations, standards and Standard Conditions of Approval of the City, including appropriate standards for emergency access roads, emergency water supply, and fire preparedness, capacity, and response. New developments may incorporate up-to-date fire protection features and technology (e.g., smoke alarms, interior sprinkling systems). Development would bring additional annual revenue to the City in the form of increased local property taxes and sales taxes that would help offset the increased demand for fire and emergency medical services by funding increases in firefighters, administrative personnel, training, and equipment. In addition, new development would be required to incorporate design features identified in the California Building Code, and the OFD reviews and comments on the design of any project that could affect fire or public safety. New development may reduce crime by incorporating crime prevention through environmental design (CEPTD) principles and up-to-date security features and technology, and by economic growth and revitalization, and increased employment and personal.

Cumulative fire service impacts would also be reduced by mitigation measures applicable to redevelopment of the former Oakland Army Base. Mitigation Measure 4.9-1 of the July 2002 Final Environmental Impact Report of the Oakland Army Base Area Redevelopment Plan would require the City and the Port of Oakland to cooperatively investigate the need for, and if required, fund on a fair-share basis, the development and operation of increased fire fighting and medical emergency response services via fireboat to serve the former Army Base. The City and Port would also be allowed to develop fee formulae to recoup initial investment from future development or tenants, as well as a long-term cost-sharing formula to equitably distribute the cost of continuing operations.²⁹

Until any specific facilities expansion needs can be identified in terms of timing, location, size and characteristics, assessment of associated environmental impacts would be too speculative for evaluation. If and when any proposal for expanded or new OFD or OPD facilities is identified by the City, it would require its own environmental review under CEQA.

With implementation of the City's Standard Conditions of Approval, normal development review and permitting procedures, and building and fire code requirements, cumulative impacts related to fire protection and police protection would be less than significant.

Schools

Cumulative development throughout West Oakland would generate additional students attending the Oakland Unified School District (OUSD). The OUSD collects school impact fees from residential and non-residential development. Under California Government Code Sections 65995, 65996(a) and 65996(b), payment of these fees is deemed to be full and complete mitigation. If classroom capacity within the specific schools serving the Planning Area were unavailable at the time new students enter the school system, the OUSD could reassign students, expand year-round schooling, add portable classrooms, transport students to less crowded schools, or more efficiently use existing or abandoned school facilities. The duty of a lead agency to mitigate school impacts beyond the state-mandated fees arises only where there is a physical environmental impact involved beyond the mere addition of students to a school. Without definitive, detailed information on any needed future school district facility expansion plans, such secondary physical environmental impacts would be too speculative to evaluate at this time. Therefore, cumulative impacts related to schools would be less than significant.

²⁹ City of Oakland, 2012 Oakland Army Base Project Initial Study/Addendum, May 2012, p. 342.

Parks and Recreation

Cumulative development throughout West Oakland would generate a need for additional parkland, adding to the existing deficiency of parkland acreage, and would increase the use of existing parks and recreational facilities such that substantial physical deterioration of such facilities may occur or be accelerated. The cumulative impact on parks and recreational facilities may be significant. Parkland, recreational facilities and recreational trail links are proposed to be provided within and adjacent to the Planning Area as part of the planned Gateway Park. The Specific Plan also proposes improvements to the public realm environment. Parks and recreational facilities may be required as part of new development projects and on-site useable open space or recreational facilities in new residential developments may offset some of the need. Therefore, the Specific Plan would not be expected to increase the use of existing parks and recreational facilities such that substantial physical deterioration of such facilities may occur or be accelerated, and the contribution of the Specific Plan to the identified significant cumulative impact on parks and recreational facilities would be less than considerable and thus less than significant.

Findings of the Housing Element Initial Study

The most recent Housing Element update was the subject of an Initial Study of environmental effects, completed in 2009, and a Draft EIR completed in 2010. The findings of this analysis are relevant because they are recent and because they consider housing development on a range of potential development sites including in the Planning Area.

The Housing Element Initial Study determined that the development of the identified housing opportunity sites may result in the need for new or expanded fire, police, school, and park facilities. The construction of new or expanded fire, police, school or park facilities could result in adverse environmental impacts. However, all future development would occur pursuant to General Plan policies, Municipal Code regulations, mitigation measures adopted for the LUTE EIR, and the SCAs that would reduce the potential impact on services to less than significant levels. Moreover, separate CEQA review would be implemented, as needed, for new construction as required by State law, and additional mitigation measures would be imposed to reduce impacts. As such, the Housing Element Initial Study concluded that impacts on public services would be less than significant.

Mitigation Measures

None required