

3.6 Public Services

Public services include basic support systems necessary for a functioning community. This section of the Warner Ranch Project (proposed project) Environmental Impact Report (EIR) addresses school services and fire and law enforcement protection. This EIR section is based on information contained in the San Diego County General Plan EIR (County of San Diego 2011a), the Warner Ranch Infrastructure Study (Appendix L), the Warner Ranch Fire Protection Plan (FPP; Appendix I) and information obtained from personal communication and documents received from the school districts.

3.6.1 Existing Conditions

3.6.1.1 *Environmental Setting*

The Warner Ranch property (project site) covers approximately 513 acres. A portion of its southern boundary is State Route 76 (SR 76), and its northeast corner is at Pala Temecula Road. It is across SR 76 and just west of the Pala Casino and is adjacent to the Pala Band of Mission Indians Reservation. It has previously been the site of an equestrian facility, and currently has two avocado groves and two citrus groves. At one time, the property was a ranch with guest houses, but it has been vacant for several years except for caretakers.

Fire Protection

Within the unincorporated region's emergency services system, fire and emergency medical services are provided by Fire Protection Districts, County Service Areas (CSA), and the California Department of Forestry and Fire Protection (CAL FIRE). Collectively, there are over 2,800 firefighters responsible for protecting the San Diego region from fire. Generally, each agency is responsible for structural fire protection and wildland fire protection within their area of responsibility. However, mutual and automatic aid agreements enable non-lead fire agencies to respond to fire emergencies outside their district boundaries (County of San Diego 2011a).

On June 25, 2008, the County Board of Supervisors approved a program to merge the rural fire companies and facilitate management for fire protection of the County's rural backcountry. Under this program, the County brought six volunteer fire companies under the San Diego County Fire Authority (SDCFA) and exercised the County's latent powers to provide fire and emergency medical services within the latent powers subarea of County Service Area (CSA) 135. This reorganization encompassed approximately 942,000 acres, which represented roughly 60 percent of the entire target area. The next step was to add CSAs 109 (Mt. Laguna), 110 (Palomar Mountain), 111 (Boulevard), 112 (Campo), and 113 (San Pasqual) to CSA 135 resulting in service to approximately 1 million acres, or roughly 70 percent of the target area. Currently, the County has applied to LAFCO to expand the latent powers of CSA 135,

concurrent with the dissolution of San Diego Rural and Pine Valley Fire Protection Districts. This process is near completion. As a result, the SDCFA encompasses 2,344 square miles and provides structural and wildland fire protection as well as paramedic first responder and ambulance transport emergency medical services, rescue and fire prevention. The SDCFA operates out of thirty stations.

Law Enforcement

The San Diego County Sheriff's Department (SDCSD) provides law enforcement services to the unincorporated areas of the County including the proposed project site. The SDCSD has approximately 4,000 employees, 800 vehicles, and a fleet of helicopters. The SDCSD operates eight major detention facilities and provides security for 171 courtrooms and 10 courthouses throughout the County. SDCSD facilities located in unincorporated areas provide general law enforcement patrol, crime investigation, and crime prevention services. The SDCSD Law Enforcement Services Bureau operations are organized under a system of command stations, substations, offices, and storefronts.

The SDCSD service area covers approximately 4,200 square miles. The SDCSD provides service to the project site from their Valley Center Substation, located at 28205 North Lake Wohlford Road, approximately 15 miles to the southeast of the subject property. The Valley Center Substation provides law enforcement services to approximately 21,870 residents. (SANDAG) The substation's service area encompasses 330 square miles, which includes the communities of Pala, Pauma and Rincon Valleys, Palomar Mountain, and the Rancho Guejito Ranch, as well as the La Jolla Pala, Pauma, Rincon, and San Pasqual Indian reservations (San Diego County Sheriff's Department 2013). The substation facility is approximately 5,490 square feet in size, with a total of 23 sworn personnel serving the area.

With 23 officers for 21,870 residents, the Valley Center Substation currently maintains a staffing ratio of one sworn officer per 950 residents, which far exceeds the SDCSD goal of one officer per 10,000 population. The project would add approximately 2,245 people to the area. With the addition of project residents, the service ratio would be one sworn officer per 1,048 population. Pursuant to the comments received from SDCSD, with the addition of two new officers, provided through the payment of property taxes, adequate personnel would be available to serve the project at approximately the same current performance levels. Calls are assigned a priority based on the nature of the incident and the level of urgency. Priority 1 is considered the highest priority and includes officer assistance and/or vehicular pursuit calls. Priority 2 calls include injured persons, robbery in progress, bomb threats, and stolen vehicles. Priority 3 calls include assaults, prowlers, disturbances, tampering with vehicles, and burglary alarms. Priority 4 calls are the lowest priority calls and include security checks, animal noise disturbances, traffic stops, harassing phone calls, illegal dumping, and abandoned vehicles. Response times are used as

guidelines to measure adequate levels of service. In the calendar year 2007, the average adjusted response time for the Valley Center Substation was 19 minutes for priority calls and 33 minutes for non-priority calls (County of San Diego 2011a).

Law enforcement for the Pala Reservation is provided by the Pala Band's security force and the SDCSD. The Pala Band contracts with the SDCSD to provide two Special Purpose Deputies 5 days per week, 8 hours per day. The Special Purpose Deputy has an office in the Pala town site on the reservation. The closest sheriff's substation is the Valley Center Substation.

Schools

On November 12, 2012, Proposition BB was approved by voters in the Fallbrook and Bonsall school districts to create a new K–12 district, Bonsall Unified School District (BUSD). The previous Bonsall Union School District ceased to exist on June 30, 2014. The project site is located within the BUSD, which offers a variety of educational facilities serving the project site including Bonsall Elementary (K–8), Norman L. Sullivan Middle School (Sullivan Middle School; 6–8), and Bonsall High School (9–12), located at Sullivan Middle School. The district also has a second elementary school, Bonsall Elementary School West. An additional site for an elementary school will be provided by the Meadowood project should the BUSD decide to accept the property for construction of a school facility. The San Diego County School District boundaries are shown in Figure 3.6-1.

Bonsall Elementary is located at 31555 Old River Road, approximately 12 miles west of the proposed project site. Student enrollment for the 2014-2015 school year was 948 students; the current estimated school capacity was 974 (Pickering, pers. comm. 2015). Sullivan Middle School is located at 7350 West Lilac Road, approximately 10 miles west of the proposed project. Enrollment during the 2014-2015 school year was 559 students; the current estimated capacity was 613 (Pickering, pers. comm. 2015). Bonsall High School, which is co-located with Sullivan Middle School, had an enrollment of 63 students, with an estimated capacity of 210 students, during the 2014–2015 school year (Pickering, pers. comm. 2015).

Pursuant to Government Code Section 65995 et seq., new development is assessed fees by school districts to offset demands for service, with limits on the assessment set by state law. The school fees are collected when building permits are issued. None of the schools anticipated to serve the project site are listed on the state's Critically Overcrowded School list.

3.6.1.2 Regulatory Setting

County of San Diego General Plan

Public services are addressed in the County's General Plan Safety Element and Mobility Element.

General Plan Safety Element

The General Plan Safety Element addressed law enforcement and fire protection goals and policies. The San Diego County Sheriff is responsible for providing law enforcement services in the unincorporated County and to certain cities under contract. The General Plan Land Use Maps identify where future development will occur, which can be used by the Sheriff in conjunction with forecasts from contract cities, to prepare facility and service plans. As higher density residential and commercial areas typically produce more calls for service, these areas have been identified as preferred locations of future Sheriff Facilities in the unincorporated County. Additionally, Crime Prevention Through Environmental Design (CPTED) is recognized as an effective planning tool to help minimize or deter criminal activity. CPTED consists of four complementary strategies including natural surveillance, access control, maintenance, and territorial reinforcement (or encouraging owners of private spaces to exercise control over their area by challenging intruders). CPTED does not eliminate crime within a neighborhood, but it can dramatically reduce the likelihood of theft and other crimes.

Regarding fire protection, the General Plan Safety Element includes acceptable response travel time distances based on land use designations. During the past several years, the County instituted a number of safety-related programs and policies to reduce the risk of fire hazards. From 2004 to 2006, the County created the County Fire Enhancement Program to assist underfunded rural fire agencies. On June 25, 2008, the Board of Supervisors created the San Diego County Fire Authority, bringing together volunteer fire companies, fire districts, and CAL FIRE under the banner of regional coordination with local control. Select applicable General Plan policies are listed below:

- **S-6, Adequate Fire and Medical Services.** Adequate levels of fire and emergency medical services (EMS) in the unincorporated County.
- **S-6.1, Water Supply.** Ensure that water supply systems for development are adequate to combat structural and wildland fires.
- **S-6.2, Fire Protection for Multi-Story Development.** Coordinate with fire services providers to improve fire protection services for multi-story construction.
- **S-6.3, Funding Fire Protection Services.** Require development to contribute its fair share towards funding the provision of appropriate fire and emergency medical services as determined necessary to adequately serve the project.
- **S-6.4, Fire Protection Services for Development.** Require that development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards) of the General Plan.

- **S-6.5, Concurrency of Fire Protection Services.** Ensure that fire protection staffing, facilities, and equipment required to serve development are operating before, or in conjunction with, the development. Allow incremental growth to occur until a new facility can be supported by development.
- **S-14, Crime Prevention.** Crime prevention through building and site design.
- **S-14.1, Vehicular Access to Development.** Require development to provide vehicular connections that reduce response times and facilitate access for law enforcement personnel, whenever feasible.
- **S-14.2, Development Safety Techniques.** Require development within Village areas to utilize planning and design techniques, as appropriate that deter crime.
 - Examples of design features include the following:
 - Avoiding landscaping that might create blind spots or hiding places
 - Centrally locating open green spaces and recreational uses so that they are visible from nearby homes and streets
 - Designing streets to discourage cut-through or high-speed traffic
 - Installing paving treatments, plantings, and architectural design features, such as columned gateways, to guide visitors to desired entrances and away from private areas
 - Installing walkways in locations safe for pedestrians
 - Designing lots, streets, and homes to encourage interaction between neighbors
 - Including mixed land uses that increase activities on the street
 - Siting and designing buildings oriented for occupants to view streets and public spaces

General Plan Mobility Element

The County's General Plan Mobility Element contains policies regarding ingress, egress, and emergency vehicle accommodation within projects. The following Mobility Element policy applies to public services:

- **M-4.4, Accommodate Emergency Vehicles.** Design and construct public and private roads to allow for necessary access for appropriately-sized fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents.

Senate Bill 50/CA Government Code Section 65995

SB 50 was signed into law in 1998 imposing limitations on the power of cities and counties to require mitigation of school facilities' impacts as a condition of approving new development. It

also authorizes school districts to levy statutory developer fees at a higher rate for residential development than previously allowed. SB 50 amended Government Code Section 65995(a) to provide that only those fees expressly authorized by law (Education Code Section 17620 or Government Code Sections 65970, et seq.) may be levied or imposed in connection with or made conditions of any legislative or adjudicative act by a local agency involving planning, use, or development of real property.

Other relevant sections of the Government Code include:

- Section 65995(h), which declares that the payment of the development fees authorized by Education Code Section 17620 is “full and complete mitigation of the impacts of any legislative or adjudicative act . . . on the provision of adequate school facilities.”
- Section 65995(i), which prohibits an agency from denying or refusing to approve a legislative or adjudicative act involving development “on the basis of a person's refusal to provide school facilities mitigation that exceeds the amounts authorized [by SB 50].”

Assembly Bill 16

In 2002, AB 16 created the Critically Overcrowded School Facilities program, which supplements the new construction provisions of the School Facilities Program (SFP). SFP provides state funding assistance for two major types of facility construction projects: new construction and modernization. The Critically Overcrowded School facilities program allows school districts with critically overcrowded school facilities, as determined by the California Department of Education (CDE), to apply for new construction projects in advance of meeting all SFP new construction program requirements. Districts with SFP new construction eligibility and school sites included on a CDE list of source schools may apply.

California Health and Safety Code (Section 13000 et seq.)

State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

California Code of Regulations Title 24, Part 2 and Part 9

Part 2 of Title 24 of the CCR refers to the California Building Code, which contains complete regulations and general construction building standards of the state adopting agencies, including administrative, fire and life safety and field inspection provisions. Part 9 refers to the California

Fire Code, which contains fire-safety-related building standards referenced in other parts of Title 24. This code is preassembled with the 2000 Uniform Fire Code of the Western Fire Chiefs Association. This code was revised in January 2008 with a change in the base model/consensus code from the Uniform Fire Code series to the International Fire Code.

Subdivision and Fire Hazards Bill AB 2447

AB 2447 requires the legislative body of a County to deny approval of a Tentative Map for development, or a parcel map for development, if the project is in an SRA or a very high fire hazard sensitivity zone. The exception to AB 2447 includes projects that obtain written verification from each fire protection agency having jurisdiction over the project site or provide verification that there would be sufficient structural fire protection for the structures created by the project (County of San Diego 2011b). Effective October 28, 2011, the Consolidated Fire Code (County of San Diego 2011b) includes County amendments to the 2010 California Fire Code and the ordinances of the 16 unincorporated County fire protection districts. Response time is defined as the elapsed time from the fire department's receipt of the first alarm to when the first fire unit arrives at the scene (County of San Diego 2011b). Response time within the unincorporated County is generally accepted as five minutes.

3.6.2 Analysis of Project Effects and Determination as to Significance

The County of San Diego has not developed guidelines for determination of significance for public services. Guidelines used here are taken from Appendix G of the California Environmental Quality Act (CEQA) Guidelines (14 CCR 15000 et seq.).

Guidelines for Determination of Significance

A significant impact to public services would occur if:

1. The project would result in substantial adverse physical impacts associated with the provision of new or physically altered government 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 service ratios for law enforcement protection.
2. The project would result in substantial adverse physical impacts associated with the provision of new or physically altered government 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 service ratios for fire protection.

3. The project would result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives for educational services.

3.6.2.1 Law Enforcement

Analysis (Guideline 1)

The SDCSD does not have adopted response times because response times depend on such factors as type of call, call priority, previous calls pending, time of day, the location of the squad car and the amount of traffic. Therefore, the performance measurement for adequate service standards is service ratio.

The proposed project would involve the development of the 513-acre site with 780 residential units and associated public and private facilities and services. The SDCSD reviewed the project to determine whether any new or expanded facilities would be needed as a result of an increase in residential population by approximately 2,245 people. The SDCSD indicates the project would result in the need for two additional sworn personnel to achieve a service level of three patrol shifts per day per 10,000 residents. Therefore, as a condition of the project and pursuant to the Safety Element of the General Plan, prior to approval of a Major Use Permit the applicant shall make a fair share contribution to fund the provision of two additional sworn personnel for the Valley Center Command area.

The project would not require the expansion of existing law enforcement facilities or the construction of new facilities. As such, the project would not result in impacts associated with the provision of new or physically altered facilities.

Staff from the SDCSD has provided design recommendations that would assist in reducing policing concerns. These recommendations include the following:

1. Defensible space that also increases visibility in and around structures
2. Lighting in public areas in compliance with Zone A of the County Light Pollution Code
3. Security gating of the project
4. House orientation to provide private park visibility
5. Fencing for public and private trails and internal recreation facilities
6. Cameras at the project entry

These recommendations have been incorporated into the project design through the Major Use Permit, Conceptual Landscape Plans, Fire Protection Plan, and on the Vesting Tentative Map for the project, as appropriate.

General Plan policies also assure that adequate law enforcement services are available. The project is consistent with relevant General Plan goals and policies. Specifically, Policy LU-12.2 requires development to mitigate significant impacts to existing service levels. Residents of the project would support the SDCSD through property tax payments as is done by all County residents.

While the projected population of the project would result in the requirement for increased law enforcement sworn personnel, there would be no need for new or expanded facilities. Existing policies and regulations assure that law enforcement would be available to support the project's needs and are provided concurrently with growth and development. Potential impacts associated with the construction of new or expanded law enforcement facilities would be **less than significant**.

3.6.2.2 Fire Protection

Analysis (Guideline 2)

An indicator for determining adequate fire protection and emergency medical response is the capacity to respond to emergencies within acceptable time parameters. Travel time is defined as the estimated time it would take for responding emergency personnel to reach the furthest structure in a proposed development project. Travel time is determined by measuring the most direct reliable route with consideration given to safe operating speeds for heavy fire apparatus. The County's General Plan sets policy for fire protection services for development. It requires that new development demonstrate that fire services can be provided that meets minimum travel times. The acceptable response time associated with the proposed project is 5 minutes. This subchapter examines whether significant impacts would occur as a result of providing the project with fire protection and emergency services within the travel time requirements of the General Plan.

The Warner Ranch project is situated within the San Diego County Fire Authority (SDCFA). The proposed project would be required to construct a new fire station of approximately 10,000 square feet in size at the southwestern edge of the project site, adjacent to the project main entry and SR 76 (see Figure 1-1 in Chapter 1, Project Description) to serve the project's 780 residences within the 5-minute response time required by the General Plan. The fire station will be developed in two phases. The initial phase will be a temporary fire station with adequate accommodations for firefighting personnel and equipment to protect the initial phases of the proposed project. The

second phase of the fire station, which is the permanent station building, shall be constructed prior to the issuance of the 391st building permit to the satisfaction of SDCFA.

This subchapter examines whether significant impacts would occur as a result the construction of the new fire station. The issue under CEQA is whether the proposed project would “result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts...” A discussion of the project’s exposure to a significant risk of loss, injury, or death resulting from fire is detailed in Section 2.7.2.1 (Wildfire). Section 2.7, Hazards and Hazardous Materials, provides a detailed analysis of the availability and adequacy of fire protection services, with the construction of the new fire station on the project site.

The development of the both phases of new fire station would be within the development footprint of the project site. Construction and operation of this new facility associated with site clearing and grading, building construction, traffic and noise have been addressed in the applicable sections of this EIR, including Section 2.5, Geology and Soils; Section 2.11, Transportation and Traffic; and Section 2.10, Noise. Construction impacts would be less than significant for air emissions from building construction, noise, cultural resources, biological resources, hydrology, and water quality with implementation of the mitigation measures and incorporation of the design measures proposed in the EIR. Therefore the environmental impacts from the construction of both phases of the new fire station would be **less than significant**.

3.6.2.3 Schools

Analysis (Guideline 3)

The project site is located within the BUSD (K–12). This district offers a variety of educational facilities serving the project site, including Bonsall Elementary (K–8), Sullivan Middle School (6–8), and Bonsall High School (9–12).

Implementation of the project would result in the development of 564 single-family and 216 multifamily residential dwelling units. As shown in Table 3.6-1, Student Generation Rates for School Districts Serving the Project, the project would generate approximately 320 elementary school students and middle school students, and 320 high school students, based on the BUSD’s student generation rates.

Although Bonsall Elementary, Normal Sullivan Middle School, and Bonsall High are currently operating very near estimated student capacity as of April 13, 2015, recent activity regarding a new development in the area indicates that this may change over time (Pickering, pers. comm. 2015; County of San Diego 2015). (Based on the increased student body associated with the

project, there would not be adequate capacity in the schools to serve the project's student generation (County of San Diego 2015)). However, BUSD has indicated its ability to place temporary portable classrooms on existing school sites as an interim solution to the new students that result from new development in the area (County of San Diego 2014, p. 3-110).

The issue under CEQA is whether the proposed project would “result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts...” The development of new school facilities is not planned as a result of the proposed project. However, the school district may decide to construct new facilities to accommodate students in the future. The school district is responsible for construction of such facilities if required, and would be subject to a separate CEQA process. Should the school district determine that a new school site is required, potential impacts associated with the new school facilities would be evaluated by the district when the location and project details are available. Potential impacts resulting from the construction of the additional elementary school site within the Meadowood project was analyzed as a part of that project's EIR (County of San Diego 2011c). Prior to approval of building permits, the applicant would be required to pay applicable school fees, pursuant to SB 50, to the BUSD to help maintain adequate school facilities and levels of service, in accordance with California Education Code 17620. SB 50 provides that the statutory fees found in the Government and Education Codes are the exclusive means of considering, as well as mitigating for school impacts. Payment of required school impact fees is considered full mitigation for any impacts to school services that would result from a project for either school district. (Government Code §65995(b)). None of the schools anticipated to serve the project site are listed on the state's Critically Overcrowded School list. Impacts to school services, therefore, would be **less than significant**.

3.6.3 Cumulative Impact Analysis

Guidelines for Determination of Significance

The cumulative projects would result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives for public services.

3.6.3.1 Law Enforcement

The proposed project, in conjunction with other projects in the area, would place an added demand for law enforcement in the area. A list of cumulative projects considered in developing

the cumulative impacts is shown in Table 1-5. Several cumulative projects in the vicinity of the proposed project were considered for the analysis of cumulative effects; see Table 1-5 of this EIR, including the Elder Subdivision project that proposes 14 multi-family units on 7 lots; The Crest, a 109-lot residential development; Harvest View Estates 9 residential lots; Alvarado Knolls Subdivision, 17 residential lots; and Pepper Tree Park, 73 single family units and 14+ acres of general commercial/office. Development of the proposed project would generate an incremental increase in demand for law enforcement services within the County. Based on growth studies relied upon for the preparation of the GPU FEIR, the Valley Center command area is a beat area that would experience the greatest percentage growth in housing and population under the GPU, an estimated 127 percent increase in housing and population. Higher density residential areas typically produce more calls for law enforcement services, and these areas are identified as preferred locations for future sheriff facilities in the unincorporated County. The increase in demand for law enforcement from the implementation of cumulative projects could have the potential to result in the need to construct or expand existing law enforcement facilities, which would have the potential to create an adverse impact on the environment. However, like the project, individual cumulative projects would undergo environmental review, and would be required to demonstrate compliance with General Plan policies and prior to project approval to assure the adequacy of services. General Plan policies assure that services would be provided with the needs of development. The completion of a new or expanded facility would be required to undergo subsequent environmental review. Therefore, the project, in combination with the identified cumulative projects would have a **less than significant** cumulative impact associated with the construction of law enforcement facilities.

3.6.3.2 Fire Protection

The proposed project, in conjunction with other projects in the area, would place an added demand for fire protection in the area. A list of cumulative projects considered in developing the cumulative impacts is shown in Table 1-5. As required by the General Plan, each cumulative project within the study area would be required to assure adequate fire service. The project would provide a new fire station on-site that would address fire protection for the project as well as areas surrounding the project site. The proposed project would comply with all applicable County goals and policies, including measures to accommodate for growth and increased service demands. Therefore, the project's contribution to this less-than-significant cumulative impact would not be considerable, and the cumulative impact would be **less than significant**.

3.6.3.3 Schools

The proposed project, in conjunction with other projects in the area, would place an added demand for school services in the area. A list of cumulative projects considered in developing the cumulative impacts is shown in Table 1-4. Recent activity regarding new development in the

area indicates that Bonsall Elementary, Normal Sullivan Middle School, and Bonsall High may not remain below capacity. Other large residential projects within the district's service area, such as Meadowood, Campus Park, Campus Park West, and Lilac Hills Ranch, would affect available capacity in a similar way as the proposed project. Lilac Hills Ranch, however, would include a site for location of a combined elementary and middle school and an additional site for an elementary school will also be provided by the Meadowood project that would increase overall available capacity for the district and reduce the overall potential cumulative effect on schools should the BUSD decide to accept either or both of the sites for construction of a school facility. Policies and measures included in the General Plan accommodate for growth and increased service demands to ensure that adequate school facilities are provided to serve the total anticipated student enrollment in the County, as well as in planning documents prepared by the school districts. Those policies, coupled with the payment of statutory fees by developers under AB 50 would serve to satisfy the impact of development on school facilities. The cumulative impact is less than significant. Therefore, the project's contribution to the **less than significant** cumulative impact on schools would be less than significant.

3.6.4 Conclusions

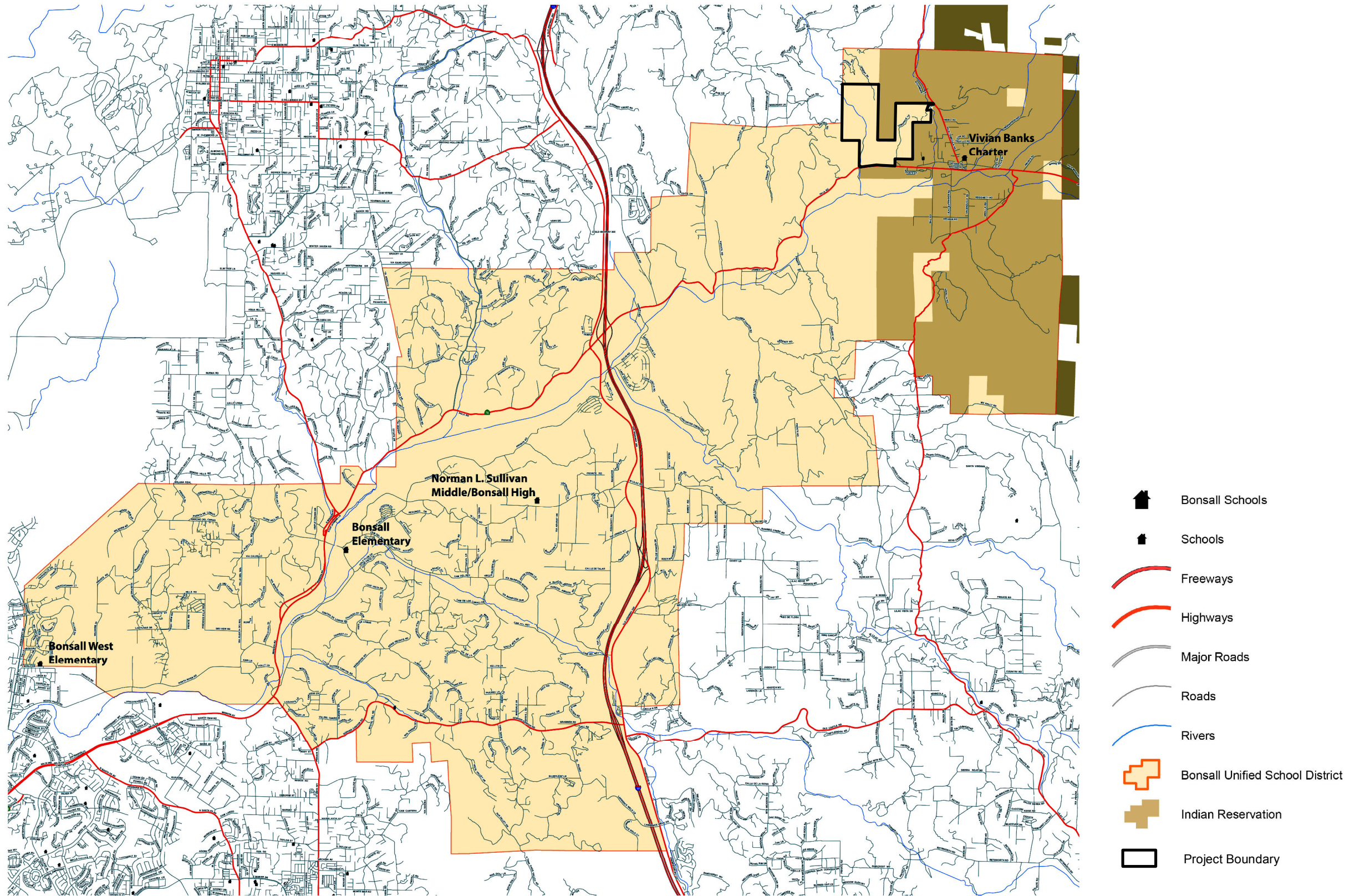
Impacts to public services would be less than significant.

Table 3.6-1
Student Generation Rates for School Districts Serving the Project

School District	Grades	Student Generation Rate (student/DU)	Proposed Residential Units Within District	Project Student Generation
BUSD	K-8	SF = 0.416 MF = 0.393	SF = 564 MF = 216	SF = 235 MF = 85 Total = 320
BUSD	9-12	SF = 0.416 MF = 0.393	SF = 564 MF = 216	SF = 235 MF = 85 Total = 320

DU = dwelling unit; SF = single-family; MF = multifamily.

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