

PUBLIC SERVICES AND RECREATION

4.15 PUBLIC SERVICES AND RECREATION

This chapter describes existing public services, parks, and recreation within the Environmental Impact Report (EIR) Study Area and evaluates the potential environmental consequences of potential future development that could occur by adopting and implementing the proposed project. A summary of the relevant regulatory framework and existing conditions is followed by a discussion of potential impacts and cumulative impacts.

4.15.1 FIRE PROTECTION SERVICES

4.15.1.1 ENVIRONMENTAL SETTING

This section describes regulations, resources, facilities, equipment, response times, and budget for fire protection services. The analysis in this section is based on the *Community Services Background Report: San Rafael General Plan 2040* prepared by the San Rafael Community Development Department in February 2020. Information was provided through correspondence between Barry Miller, San Rafael General Plan 2040 Project Manager, and Deputy Fire Chief Robert Sinnott.

Regulatory Framework

State Regulations

California Government Code

Section 65302 of the California Government Code requires General Plans to include a Safety Element, which must include an assessment of wildland and urban fire hazards. The Safety and Resilience Element of the existing General Plan 2020 and the proposed General Plan 2040 satisfies this requirement.

California Department of Forestry and Fire Protection

The California Department of Forestry and Fire Protection (CAL FIRE) is dedicated to the fire protection and stewardship of over 31 million acres of California's wildlands. The Office of the State Fire Marshal supports CAL FIRE's mission to protect life and property through fire prevention engineering programs, law and code enforcement, and education.

California Building Code

The State of California provides a minimum standard for building design through Title 24 of the California Code of Regulations (CCR), commonly referred to as the California Building Code (CBC). The CBC is in Part 2 of Title 24. The CBC is updated every three years. It is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. Commercial and residential buildings are plan-checked by local City building officials for compliance with the CBC. Typical fire safety requirements of the CBC include the installation of sprinklers in all high-rise buildings and other facilities; the establishment of fire resistance standards for fire doors, building materials, and particular types of

PUBLIC SERVICES AND RECREATION

construction in high fire hazard severity zones; requirements for smoke-detection systems and exiting requirements; and the clearance of debris.

California Fire Code

The California Fire Code incorporates, by adoption, the International Fire Code of the International Code Council, with California amendments. The California Fire Code is the official fire code for the State of California (State) and all political subdivisions. It is found in Title 24 of the CCR, Part 9, and, like the CBC, it is revised and published every three years by the California Building Standards Commission. Also like the CBC, the California Fire Code is effective statewide, but a local jurisdiction may adopt more restrictive standards based on local conditions.

The California Fire Code is a model code that regulates minimum fire safety regulations for new and existing buildings, facilities, storage, and processes, including emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution. Typical fire safety requirements include installation of sprinklers in all high-rise buildings; the establishment of fire-resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

Unified Hazardous Waste and Hazardous Materials Management Program

The routine management of hazardous materials in California is administered under the Unified Hazardous Waste and Hazardous Materials Management Program (Unified Program). San Rafael's hazardous materials programs are administered and enforced under the Unified Program. The California Environmental Protection Agency has granted the City's responsibilities to the Marin County Department of Public Works, Waste Management Division, including implementation and enforcement of hazardous material regulations under the Unified Program as a Certified Unified Program Agency.

Local Regulations

Marin County Code of Ordinances

The Marin County Code of Ordinances (MCCO) is organized by title, chapter, and section. It contains all ordinances for the County. Most provisions relating to fire protection services are included in Title 16, Fire, which establishes the jurisdiction of the Marin County Fire Department (MCFD). Services of the MCFD include response to all types of fires and other emergencies in County unincorporated areas, fire prevention, investigation, emergency medical services, and management of the wildland-urban interface, including areas within the EIR Study Area. Title 16, Fire, of the MCCO includes the following two chapters related to adoption and amendments to adopted codes:

- **Chapter 16.16:** Adoption of California Fire Code and International Fire Code, which adopts prescriptions regulating governing conditions hazardous to life and property from fire or explosion. This includes the 2019 Fire Code, which consists of portions of the 2018 International Fire Code as amended by the California Building Standards Commission.

PUBLIC SERVICES AND RECREATION

- **Chapter 16.17:** Urban-Wildlife Interface Code, which adopts the 2003 edition of the International Urban-Wildland Interface Code. This code governs the mitigation of wildfire hazards to life and property from the intrusion of fire from wildland exposures.

MCCO Title 19, Marin County Building Code, adopts the 2019 CBC and the 2018 International Building Code to promote healthy, safe, and sustainable communities. Title 19 includes building regulations related to the fire resistance of buildings.

San Rafael General Plan 2020

The City of San Rafael 2020 General Plan goals, policies, and programs that are relevant to fire protection are primarily in the Housing, Economic Vitality, Circulation, and Safety and Resilience Elements. As part of the proposed project, some existing General Plan goals, policies, and programs would be amended, substantially changed, or new policies would be added. A comprehensive list of updated goals, policies, and programs is provided in Appendix B, Proposed General Plan Goals, Policies, and Programs, of this Draft EIR. Applicable goals, policies, and programs are identified and assessed for their effectiveness and potential to result in an adverse physical impact later in this chapter under Section 4.15.1.4, Impact Discussion.

San Rafael Municipal Code

The San Rafael Municipal Code (SRMC) includes various directives pertaining to fire protection. The SRMC is organized by title, chapter, and section. Most provisions related to fire protection are included in Title 4, Fire. Title 4 adopts the 2016 California Fire Code and the 2015 International Fire Code for the purpose of prescribing regulations governing conditions hazardous to life and property from fire or explosion, those certain codes which contain building standards and fire safety standards. A number of local amendments to the California Fire Code have been adopted in the SRMC, including requirements for properties in the wildland-urban interface, vegetation clearance standards, prohibitions on parking on private access ways, requirements for visible address numbers on all buildings, and requirements for hydrant upgrades. The SRFD typically calculates required fire flow in accordance with Uniform Fire Code and Insurance Services Office guidelines. Peak-load requirements vary based on building construction, size, type and location, and may be modified by the addition of fire alarm or sprinkler systems.

Essential Public Safety Facilities Strategic Plan

The *San Rafael Essential Public Safety Facilities Strategic Plan* (EPSFSP), adopted by the City Council in July 2015, provides guidance on future replacement, or the seismic upgrading, of the City's essential facilities, including fire stations, to ensure that the essential facilities within the city are capable of serving the citizens in the event of an emergency. The EPSFSP includes suggested improvements, estimates of costs, design and construction schedules, and identifies a range of funds for the implementation of the EPSFSP. The EPSFSP outlines several major projects recommended for either replacement or renovation, which have largely been completed or are under construction. The EPSFSP is a tool in prioritizing and informing the capital development decisions funded through the Measure E sales tax initiative. New and upgraded facilities as a result of the EPSFSP are described in Section 4.15.1.2, Existing Conditions.

PUBLIC SERVICES AND RECREATION

4.15.1.2 EXISTING CONDITIONS

The analysis in this section is based on the *Community Services Background Report: San Rafael General Plan 2040* prepared by the San Rafael Community Development Department in February 2020.

Information was provided through correspondence between Barry Miller, San Rafael General Plan 2040 Project Manager, and Deputy Fire Chief Robert Sinnott.

Service

Fire services in the EIR Study Area are provided jointly by the SRFD, MCFD, and CAL FIRE. The SRFD provides fire protection within the city limits, as well as primary fire protection to the unincorporated neighborhoods of Country Club, Bayside Acres, Los Ranchitos, the small area adjacent to the Mount Tamalpais Cemetery in Sun Valley, California Park, and Santa Venetia. SRFD additionally serves as the primary fire department for the Marinwood Community Services District, in addition to providing paramedic services to unincorporated areas within the EIR Study Area via a joint powers agreement with the County of Marin. Fire departments across Marin County have joint powers agreements and standard mutual aid agreements with one another to increase aid during fire emergencies across the county. San Rafael Fire provides initial fire attack and medical rescue service for China Camp State Park, which is in the eastern portion of the EIR Study Area. MCFD responds to major incidents in the State Park and takes control upon response.¹

Refer to Chapter 4.18, Wildfire, of this Draft EIR for detailed information on fire hazard severity zones, the wildland-urban interface, and wildfire prevention within the EIR Study Area.

Staffing and Responsibility

Preventing and extinguishing structural fires, protecting life and property safety, and reducing fire losses is an essential part of SRFD's mission. The SRFD employs a total of 69 uniformed emergency personnel, in addition to one fire chief, two administrative staff, one emergency manager, one household hazardous waste coordinator, and four part-time inspectors. The SRFD includes a Fire Prevention Bureau that issues fire permits for construction, operations, and inspections, as well as manages the City's Vegetation Management Program, which was designed in cooperation with local businesses and homeowners to ensure vegetation is adequately cleared to reduce fire risks throughout the EIR Study Area. The SRFD Fire Marshal works closely with the City's Code Enforcement Officer and inspectors to ensure all structures meet California Fire Code standards. The SRFD also provides fire response and rescue services for both urban and wildland fires within the county.

Water Supply

The City's development review process requires consultation with the Marin Municipal Water District (MMWD) to ensure adequate water supply necessary for a fire emergency. The City maintains local hydrants while the MMWD is responsible for fire flow. SRFD typically calculates required fire flow in accordance with Uniform Fire Code and Insurance Services Office guidelines. Peak load requirements vary

¹ Robert Sinnott, the Deputy Fire Chief of the San Rafael Fire Department (SRFD), November 2020.

PUBLIC SERVICES AND RECREATION

based on building construction, size, type, and location, and may be modified by the addition of fire alarm or sprinkler systems. Fire flow requirements are met in most of the EIR Study Area; deficient areas are identified by the MMWD Engineering Department, ranked along with others in the service area, and scheduled for upgrade based on need and funding availability.²

Hazardous Materials Services

As described in Chapter 4.9, Hazards and Hazardous Materials, of this Draft EIR, San Rafael's hazardous materials programs are administered and enforced under the Unified Program. The California Environmental Protection Agency has granted San Rafael's hazardous materials responsibilities to the Marin County Department of Public Works Waste Management Division, which includes implementation and enforcement of hazardous material regulations under the Unified Program as a Certified Unified Program Agency.

The SRFD holds responsibility for monitoring the storage and use of hazardous materials, including inspections of businesses. SRFD issues permits for hazardous materials use and requires a written Hazardous Materials Management Plan as part of each development permitting process. Each Hazardous Materials Management Plan must demonstrate the safe storage and handling of hazardous materials during both construction and operation of a development project.

The Marin Household Hazardous Waste Facility (MHHWF), located at 565 Jacoby Street in San Rafael, provides a hazardous material drop-off location for all residents that reside in, and all businesses located in, Marin County. The MHHWF is jointly operated by the SRFD and Zero Waste Marin. Through this partnership, San Rafael and Zero Waste Marin manage the MHHWF program for every city in the county except Novato.

Paramedic Services

In San Rafael, every SRFD firefighter is a certified Emergency Medical Technician. The number has increased over time, in response to population growth and increased demand and at this time there is no deficiency in paramedic services. Currently, 62 of the 69 uniformed SRFD uniformed firefighting staff are Paramedic certified and the remaining seven are certified Emergency Medical Technicians. Each ambulance has two paramedics, and each engine or ladder truck has at least one paramedic on duty at all times. Thus, on each medical call at least three paramedics are on scene (an engine or ladder plus an ambulance).³

Emergency Preparedness

The City's Emergency Services Coordinator is responsible for managing the City's *Local Hazard Mitigation Plan* (LHMP) and enforcing the Marin County *Emergency Operations Plan* (EOP), described in further detail in Chapter 4.9, Hazards and Hazardous Materials, and in Chapter 4.18, Wildfire, of this Draft EIR. While the LHMP is administered at the local level, the EOP was developed and is administered at a

² Robert Sinnott, the Deputy Fire Chief of the San Rafael Fire Department (SRFD), November 2020.

³ Robert Sinnott, the Deputy Fire Chief of the San Rafael Fire Department (SRFD), November 2020.

PUBLIC SERVICES AND RECREATION

countywide level by the Marin County Office of Emergency Services, with the City's Emergency Services Coordinator serving as the local point of contact.

Call Volume

During calendar year 2019, the SRFD responded to 27 residential structure fires and 27 non-residential structure fires. The SRFD also responded to 22 vehicle fires, 16 outdoor property fires, 16 wildland fires, and 28 dumpster/rubbish fires. In the EIR Study Area, there were a total of 10,980 calls for service, including 7,048 for rescue, emergency medical services (EMS), ambulances, and similar services. There were also 664 false alarms, 39 mutual-aid responses, 185 hazardous response incidents, and 2,885 other miscellaneous incidents (e.g., animal rescue, smoke).

The national Insurance Services Office (ISO) provides a rating system to evaluate fire protection services in over 39,000 fire protection areas in the United States. The ratings are used in the insurance industry to calculate premiums for homes and business properties. The ratings range from 1 to 10, and the SRFD is rated Class 1, representing superior fire protection.⁴ The SRFD currently conforms to the response time goal to be on scene within 5 to 7 minutes following a call for service, 90 percent of the time, established by the National Fire Protection Association Standard 1710.⁵ New equipment and vehicles are periodically acquired to meet these standards, replace aging equipment, and obtain new technology.

Equipment and Facilities

As shown on Figure 4.15-1 and listed in Table 4.15-1, San Rafael has six existing fire stations, many of which have undergone major rehabilitation or have been fully replaced in recent years due to aging buildings and insufficient space. This work has been carried out under the EPSFSP. By 2020, the City had completed construction on three of the six SRFD projects outlined in the EPSFSP, including rebuilding of the Station 52 training center just outside the eastern boundary of the Downtown Precise Plan Area; completion of the new Station 57 adjacent to the Marin County Civic Center; and completion of Station 51, the City's Public Safety Center located in the Downtown Precise Plan Area. Station 54 located in the Canal Neighborhood and Station 55 located on the eastern portion of the city limits along Point San Pedro Road are scheduled for seismic and operational upgrades. Station 56 located in the Terra Linda neighborhood in northern San Rafael was constructed in 1996 and requires minor seismic, accessibility, and operational improvements, which are planned as part of the EPSFSP if funds remain after the completion of the Station 54 and Station 55 enhancements.

⁴ <https://www.isomitigation.com/ppc/program-works/>, assessed on 10/29/2020.

⁵ Robert Sinnott, the Deputy Fire Chief of the San Rafael Fire Department (SRFD), November 2020.

PUBLIC SERVICES AND RECREATION

TABLE 4.15-1 FIRE STATIONS IN SAN RAFAEL

Station Number	Address	Year Constructed or Renovated
Station 51 (Public Safety Center)	1375 Fifth Avenue	2020
Station 52 (Training Center)	52 Union Street	2019
Station 54	46 Castro Avenue	1964
Station 55	955 Point San Pedro Road	1966
Station 56	650 Del Ganado Road	1996
Station 57	3530 Civic Center Drive	2019

Note: The City of San Rafael also staffs the Marinwood Fire Station (Station 58) at 777 Miller Creek Road
Source: City of San Rafael Fire Department, 2020, <https://www.cityofsanrafael.org/fire-stations/>.

The SRFD administrative facilities are located within the Marin County office building, located at 1600 Los Gamos Drive in San Rafael. The building also houses the County Fire and Sheriff's offices, including the Regional Dispatch Center, which includes the SRFD.

Budget

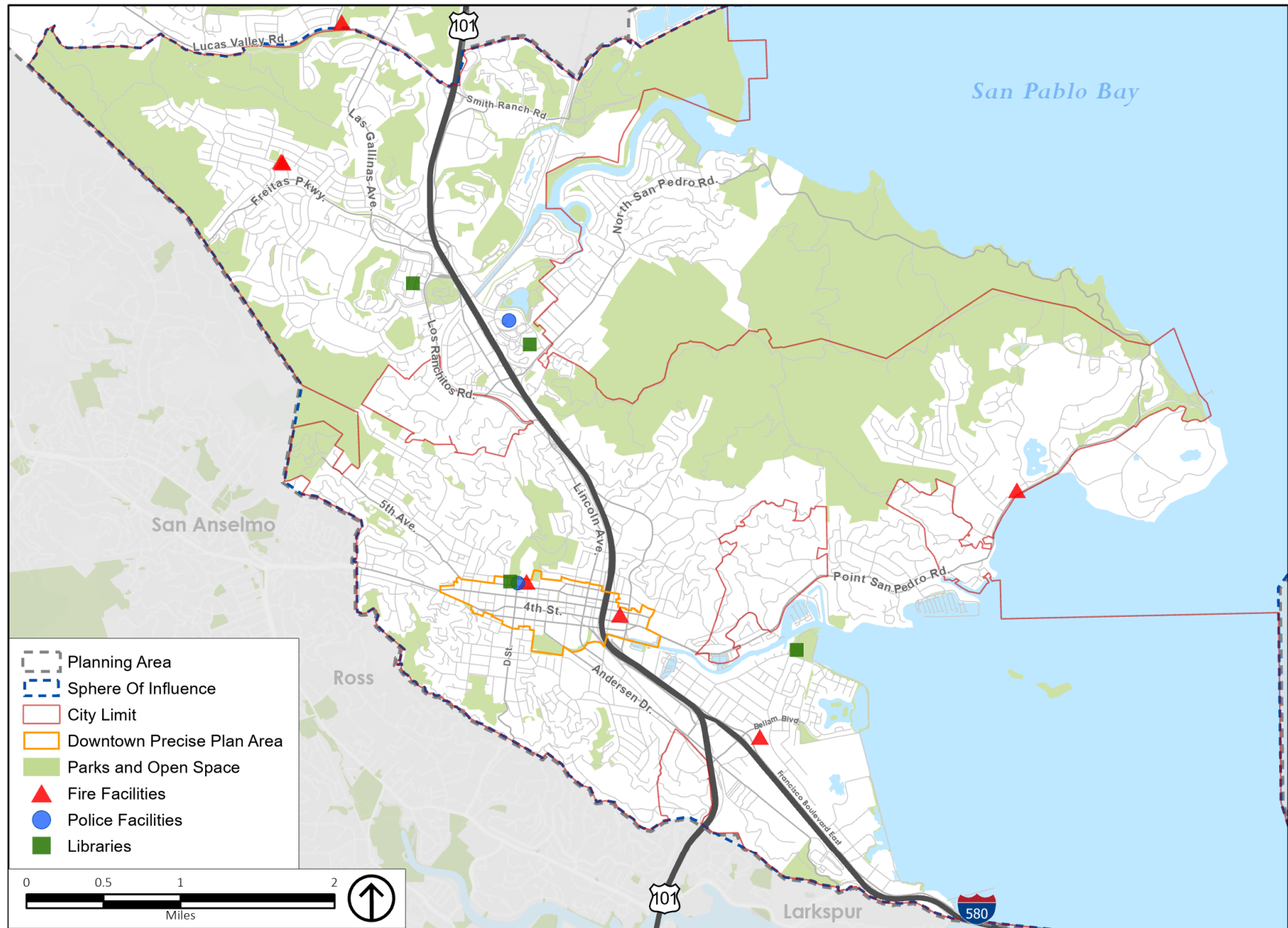
The San Rafael Municipal General Fund supports essential City services, including fire protection and hazardous materials management. In fiscal year 2019 to 2020, fire services accounted for roughly 24 percent of the City's Municipal General Fund expenditures, which included funding for employee salaries, purchasing of fire suppression equipment, and various other basic funding needs.⁶ The City does not collect development impact fees for public safety facilities but does require developer improvements such as road widening and hydrants.

An annual \$75.00 fire-flow parcel tax was approved by voters in 1996 to raise funds to improve fire flow and ensure the integrity of the water transmission system. In 2012, this fee was extended through 2031, allowing for the replacement of inadequate pipes as well as seismic improvements.

The City established the Essential Facilities Capital Projects Fund under Measure E, which was passed by voters in San Rafael in November 2013, to fund and implement the EPSFSP. This accounts for all major capital improvements to public safety facilities. The approval of Measure E in November 2013 extended an existing 0.5 percent transactions and use tax and added 0.25 percent sales tax for an additional 20 years. The new tax went into effect in April 2014. In anticipation of the additional revenue, the City Council directed staff in February 2014 to set aside the revenues from the added 0.25 percent tax to begin addressing the City's aging essential facilities, including critical improvements to public safety. Measure E revenues have raised approximately \$3.7 million per fiscal year, which has been the source of funding for each essential facility upgrade since Measure E passed in 2013.

⁶ City of San Rafael, 2019, Comprehensive Annual Financial Report for the Fiscal Year Ending June 30, 2019, <https://storage.googleapis.com/proudcity/sanrafaelca/uploads/2019/11/2019-Comprehensive-Financial-Audit-Report.pdf>, accessed on March 25, 2020.

PUBLIC SERVICES AND RECREATION



Source: ESRI, 2017; County of Marin, 2009; City of San Rafael, 2019; PlaceWorks, 2019.

Figure 4.15-1
Public Services and Facilities Locations

PUBLIC SERVICES AND RECREATION

4.15.1.3 STANDARDS OF SIGNIFICANCE

Pursuant to Appendix G, Environmental Checklist Form, of the California Environmental Quality Act (CEQA) Guidelines, implementation of the proposed project would have a significant impact related to fire protection services if it would:

1. Result in substantial adverse physical impacts associated with the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services.
2. Result in significant cumulative impacts with respect to fire protection services.

4.15.1.4 IMPACT DISCUSSION

PS-1	Implementation of the proposed project could result in the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives.
-------------	--

General Plan 2040

Potential future development would occur on a limited number of vacant parcels and in the form of infill/intensification on sites either already developed and/or underutilized, and/or in close proximity to existing development. Such locations are currently served by the SRFD and potential future development or redevelopment in the EIR Study Area is not anticipated to expand SRFD's service area, which could increase response times or disrupt other performance objectives.

Buildout of the proposed General Plan 2040 is projected to occur over a 20-year horizon. An increase in demand for fire protection services would be incremental and is in line with anticipated population growth, which would also occur without adoption of the proposed General Plan 2040. All potential future development would be accommodated as needed by the SRFD, MCFD, and CAL FIRE, with response from other city and county jurisdictions under joint powers agreements, as needed. Because potential future development would occur in existing urban areas serviced by the SRFD, and because implementation of the proposed General Plan 2040 would occur over time and not all at once, the SRFD is expected to be able to maintain a Class 1 ISO rating despite the anticipated growth.

As described in Section 4.15.1.2, Existing Conditions, the City of San Rafael has been actively renovating existing and/or constructing new SRFD facilities, as outlined in the adopted EPSFSP. The EPSFSP identified deficiencies in public service facilities in the EIR Study Area and created a blueprint for the upgrading of those facilities to meet increased demand as the population increases. At the time this Draft EIR was drafted, three of the six facility upgrades identified in the EPSFSP had been completed, including the renovation of the Station 52 training center, the construction of the new Station 57, and the construction of the Station 51 Public Safety Center. The remaining three facilities included in the EPSFSP are existing

PUBLIC SERVICES AND RECREATION

facilities that are identified as requiring seismic safety and other renovations, which will increase the service life of the buildings. If applicable, renovation activities as part of these projects would undergo review under CEQA prior to construction. Further, no construction of additional facilities is proposed as part of the General Plan 2040. Therefore, the existing fire facilities in the EIR Study Area, including the planned renovations of existing facilities, are adequate to meet the needs of the growing population and implementation of the proposed General Plan 2040 would not result in the need for new or physically altered fire protection facilities.

According to the SRFD, existing equipment and staffing levels would be adequate to accommodate growth anticipated under the proposed General Plan 2040 aside from the need for additional ambulance vehicles to meet an increase in emergency medical services demand. This is based on call trends that continue to show an increase in medical calls compared to others. Additionally, the Department continues to research an expansion of the ambulance program to include both advanced life support (ALS) paramedic ambulances and basic life support (BLS) ambulances staffed with emergency medical technicians (EMT's). This would increase the availability of the ALS ambulances for more critical emergencies. Procurement of additional ambulance vehicles and other vehicles and equipment would occur as needed through the City's annual budgeting process, which financially supports the procurement of needed equipment.⁷

The proposed Community Services and Infrastructure (CSI) Element contains goals, policies, and programs that require local planning and development decisions to consider and mitigate impacts that potential future development could have on public service facilities. The following goals, policies, and programs would serve to reduce impacts to public service facilities and services in the EIR Study Area:

Goal CSI-3: Exceptional Public Safety Services. Provide and maintain exceptional fire, public safety, and paramedic services.

- **Policy CSI-3.1: Investment in Public Safety Services.** Maintain cost-effective police, fire protection, and paramedic facilities, equipment, and services. Manage increases in costs through effective preventative measures, such as fire prevention and community policing.
 - **Program CSI-3.1B: Capital Facilities.** Complete improvements to essential public safety facilities made possible by voter-approved measures. Conduct periodic evaluations of facility and technology needs in the future to ensure that the Police and Fire Departments are equipped to respond to emergencies and deliver quality services.
 - **Program CSI-3.1D: Vehicle and Equipment Maintenance.** Maintain and upgrade vehicles and equipment as necessary.
- **Policy CSI-3.2: Mitigating Development Impacts.** Engage the Police and Fire Departments in the review of proposed development and building applications to ensure that public safety, fire prevention, and emergency access and response needs are considered and effectively addressed.
 - **Program CSI-3.2B: Emergency Response Time.** Use the development review process to identify appropriate measures to reduce fire hazards and ensure adequate emergency response capacity.

⁷ Robert Sinnott, the Deputy Fire Chief of the San Rafael Fire Department (SRFD), November 2020.

PUBLIC SERVICES AND RECREATION

- **Policy CSI-3.6: Mutual Aid.** Maintain mutual aid agreements for police and fire service with other jurisdictions and community service districts to ensure that the capacity exists to adequately respond to local emergencies.

Goal CSI-4: Reliable, Efficiently Managed Infrastructure. Support reliable, cost-effective, well-maintained, safe and resilient infrastructure and utility services.

- **Policy CSI-4.1: Capital Investment.** Provide for ongoing, preventative maintenance of infrastructure and timely replacement, repair, and upgrading of City equipment.
 - **Program CSI-4.1A: Capital Improvement Programming.** Maintain and regularly update a multi-year Capital Improvement Plan (CIP) covering City owned and operated infrastructure and public facilities. Seek the input of other local service providers (MMWD, LGVSD, etc.) when preparing the City's CIP and encourage these agencies to seek City input as they prepare their own CIPs.

Additionally, potential future development that may occur due to implementation of the proposed General Plan 2040 would be required to comply with Title 24 of the CCR and the City's Fire Code per SRMC Title 4, Fire Code. Compliance with the State's Title 24 and the City's Title 4 would ensure any new development proposed in the EIR Study Area meets the most current building and fire codes, thereby increasing safety of the buildings, and reducing the likelihood of a fire emergency, subsequently reducing demand on SRFD fire services.

The addition of the City's Public Safety Center and the recent reconstruction of Station 52 and the construction of the new Station 57, as well as the planned rehabilitation of Station 54 and Station 55, ensure that SRFD facilities are adequate to serve the anticipated buildout of the proposed General Plan 2040. Further, required compliance with State and local regulations for fire protection services, compliance with goals, policies, and programs, and the required fire department staff review of proposed development plans, would reduce any adverse impacts that potential future development could have on SRFD facilities. Additionally, SRFD has confirmed that facilities, staff, and equipment would be adequate to accommodate anticipated future growth. Additional ambulance coverage or a modification to the existing ambulance deployment program would continue to be researched by the SRFD, but no additional fire stations are planned at this time.⁸

In summary, because no new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives are required, impacts to the SRFD from the adoption and implementation of the proposed General Plan 2040, impacts are *less than significant*.

Significance without Mitigation: Less than significant.

Downtown Precise Plan

Like potential future development in the remainder of the city, potential future development in the Downtown Precise Plan Area would occur on a limited number of vacant parcels and in the form of

⁸ Robert Sinnott, the Deputy Fire Chief of the San Rafael Fire Department (SRFD), November 2020.

PUBLIC SERVICES AND RECREATION

infill/intensification on sites either already developed and/or underutilized, and/or in close proximity to existing development. The newly completed Public Safety Center Station 51, which includes fire facilities, is located in the northern portion of the Downtown Precise Plan Area, and would provide immediate response to calls from the Downtown Precise Plan Area. The proposed Downtown Precise Plan has no specific policies, and the Downtown Code has no specific regulations related to fire protection services. The proposed Downtown Precise Plan has no specific policies, and the Downtown Code has no specific regulations related to fire protection services; therefore, the impacts described for the proposed General Plan 2040 would also apply in the Downtown Precise Plan Area. Accordingly, like the General Plan 2040, implementation of the Downtown Precise Plan would also be *less than significant*.

Significance without Mitigation: Less than significant.

PS-2	Implementation of the proposed project could result in a cumulatively considerable impact to fire protection services.
-------------	---

As described in Section 4.15.1.2, Existing Conditions, the SRFD and other fire departments in Marin County provide services to each other as needed through joint powers agreements, automatic aid agreements, and mutual aid agreements.⁹ As described in Impact Discussion PS-1, the SRFD, MCFD, and CAL FIRE, along with other county jurisdictions under the joint powers agreement, would be able to adequately serve future growth under the proposed project by existing and proposed staff, equipment, and facilities. In the event that the SRFD requires new equipment or staffing, the funds for such improvements would be provided through the annual budget process and would rely on the General Fund and other funding opportunities, such as State and federal grants.¹⁰ As described in Impact Discussion PS-1, implementation of the proposed project would not create a need for new or physically altered facilities for the SRFD to provide fire protection services in the EIR Study Area. Compliance with State and local regulations, such as the proposed General Plan 2040 goals, policies, and programs listed in Impact Discussion PS-1, would ensure that fire protection services continue to adequately serve the EIR Study Area. Additionally, potential future development that may occur within and adjacent to the EIR Study Area would occur incrementally over the General Plan's 20-year buildout horizon, and therefore is not anticipated to substantially increase the population, thereby reducing the ability for fire districts and departments within the county to adequately serve residents. Further, because the proposed project is program level, and because potential future development would be required to undergo project review at the time of project application, each potential future development would be assessed for impacts to fire protection services. Therefore, the proposed project would not result in a cumulatively considerable impact to fire protection services and cumulative impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

⁹ Robert Sinnott, the Deputy Fire Chief of the San Rafael Fire Department (SRFD), November 2020.

¹⁰ Robert Sinnott, the Deputy Fire Chief of the San Rafael Fire Department (SRFD), November 2020.

PUBLIC SERVICES AND RECREATION

4.15.2 POLICE SERVICES

4.15.2.1 ENVIRONMENTAL SETTING

This section describes regulations, resources, facilities, equipment, response times, and budget for police protection services. Information was provided through correspondence between Barry Miller, San Rafael General Plan 2040 Project Manager, and Police Captain Glen McElderry, Chief Diana Bishop, Support Services Supervisor Charles Taylor, and Police Captain Dave Starnes, on January 30, 2020.

Regulatory Framework

Local Regulations

San Rafael General Plan 2020

The City of San Rafael 2020 General Plan goals, policies, and programs that are relevant to police protection are primarily in the Safety and Resilience Element. As part of the proposed project, some existing General Plan goals, policies, and programs would be amended, substantially changed, or new policies would be added. A comprehensive list of updated goals, policies, and programs is provided in Appendix B, Proposed General Plan Goals, Policies, and Programs, of this Draft EIR. Applicable goals, policies, and programs are identified and assessed for their effectiveness and potential to result in an adverse physical impact in Section 4.15.2.4, Impact Discussion.

4.15.2.2 EXISTING CONDITIONS

The analysis in this section is based on the *Community Services Background Report: San Rafael General Plan 2040* prepared by the San Rafael Community Development Department in February 2020. Information was provided through a meeting and correspondence between Barry Miller, San Rafael General Plan 2040 Project Manager, and San Rafael Police Department personnel, including Police Chief Diana Bishop, Captain Dave Starnes, Police Support Services Supervisor Charles Taylor, and Administrative Services Captain Glenn McElderry.

Service

Law enforcement services in the EIR Study Area are provided by the San Rafael Police Department (SRPD), the Marin County Sheriff's Office, and the California Highway Patrol. The SRPD has primary responsibility for areas within the City limits. The Marin County Sheriff's Office provides services to unincorporated neighborhoods within the EIR Study Area and the California Highway Patrol provides traffic enforcement in the unincorporated areas and on State and local freeways, including U.S. Highway 101 (US-101) and Interstate 580 (I-580) in the EIR Study Area. Mutual-aid agreements between these agencies allow for joint responses to major incidents.

PUBLIC SERVICES AND RECREATION

Staffing

The national staffing average for cities with populations comparable to San Rafael is 16.1 sworn personnel per 10,000 residents and 20.7 total personnel per 10,000 residents.¹¹ SRPD has a total of 66 full-time sworn officers and 25 full-time non-sworn personnel, for a total staff of 91 persons.¹² This equates to 11.0 sworn officers per 10,000 residents¹³ and 15.2 total personnel per 10,000 residents,¹⁴ which is below the national staffing average for cities with populations of comparable size.

Department Organization

The SRPD is organized into two divisions, the Operations Division and Administrative Services Division. The Operations Division includes patrols, park rangers, downtown foot beats, and traffic enforcement. The Administrative Services Division includes records, dispatch personnel, training, crime prevention, community engagement, and detective units. Some police services are provided with field patrols on a geographic (or “beat”) basis and other functions are organized on a citywide basis. Citywide services include crime prevention, investigations, community engagement, and traffic patrols.

Operations Division

The SRPD Operations Division provides uniformed police services 24 hours a day, including four patrol teams led by a single sergeant and supervised by two lieutenants, consisting of eight officers each. Two canine units and their partners are included on the teams. The patrols primarily engage in emergency response, crime suppression, traffic enforcement, and preliminary criminal investigation. A Special Operations Unit handles the Downtown Precise Plan Area, open space and marine areas, and street crimes. This unit includes the Downtown Footbeat team, the Ranger/Marine Program, the Street Crimes Unit, and Traffic Enforcement.

Administration Division

The SRPD Administration Division is responsible for recruitment, employment testing, background investigations, volunteers, the chaplain program, internal investigations, workers compensation claims, facility management, cost recovery, and crime analysis. Specific functions performed by the Administration Division include the Training Unit, the Criminal Investigations Unit, the Records Unit, the Dispatch Unit, the Property and Evidence Unit, and the Community Engagement Unit.

Call Volume

In 2019, SRPD received 21,735 calls to 9-1-1 and 76,874 administrative calls. This equates to an average of 1,035 calls to 9-1-1 a month or about 60 per day. In total, the SRPD receives between 800 and 1,000 calls a month. The SRPD received a total of 38,877 calls for service in 2019, which was a 0.2 percent decrease

¹¹ Governing, 2020, Police Employment, Officers Per Capita Rates for U.S. Cities, <https://www.governing.com/gov-data/safety-justice/police-officers-per-capita-rates-employment-for-city-departments.html>, accessed October 30, 2020.

¹² Diana Bishop, the Police Chief of the San Rafael Police Department (SRPD), November 2020.

¹³ 59,800 current residents/10,000 = 5.98; 66 full-time sworn officers/5.98 = 11 full-time sworn officers to 10,000 residents.

¹⁴ 59,800 current residents/10,000 = 5.98; 91 total staff/5.98 = 15.21 total staff to 10,000 residents.

PUBLIC SERVICES AND RECREATION

from 2018. As described in Section 4.15.1.2, Existing Conditions, for the Fire Protection Services, emergency calls are also responded to by the SRFD.

Equipment and Facilities

The SRPD headquarters is located at the newly completed Public Safety Center in the Downtown Precise Plan Area and the SRPD has two small field offices located in northern San Rafael and at the Albert Boro Community Center. The Public Safety Center is located across the street from the San Rafael City Hall and incorporates facility upgrades, including a temporary holding facility designed to separate detainees from civilian staff and expanded storage, evidence, crime lab, classroom, dispatch, and communication facilities. While the new Public Safety Center has been designed to meet the long-term needs of the SRPD, there is an ongoing need for training, new equipment and technology (including drones and automated license plate reader cameras), and resources to support crime prevention, response capacity, and investigations.¹⁵

Budget

The SRPD is funded by the City's Municipal General Fund, which supports essential City services such as police and fire protection, building and street maintenance, libraries, recreation, and parks and open space maintenance. Additional expenses are paid for by the Public Safety Fund, which is established for special police services and intended to be self-funding.¹⁶ SRPD facilities, such as the new Public Safety Center project, are funded by Measure E funds, a 20-year sales tax extension, and increase approved by San Rafael voters in 2013.

4.15.2.3 STANDARDS OF SIGNIFICANCE

Pursuant to Appendix G, Environmental Checklist Form, of the CEQA Guidelines, implementation of the proposed project would have a significant impact related to police protection services if it would:

1. Result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services.
2. Result in significant cumulative impacts with respect to police protection services.

¹⁵ Glen McElderry, the Police Captain of the San Rafael Police Department (SRPD), November 2020.

¹⁶ City of San Rafael, 2019, Comprehensive Annual Financial Report for the Fiscal Year Ending June 30, 2019, <https://storage.googleapis.com/proudcity/sanrafaelca/uploads/2019/11/2019-Comprehensive-Financial-Audit-Report.pdf>, accessed on March 25, 2020.

PUBLIC SERVICES AND RECREATION

4.15.2.4 IMPACT DISCUSSION

PS-3	Implementation of the proposed project could result in the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives.
-------------	---

General Plan 2040

Potential future development would occur on a limited number of vacant parcels and in the form of infill/intensification on sites either already developed and/or underutilized, and/or in close proximity to existing development. Such locations are currently served by the SRPD and potential future development or redevelopment in the EIR Study Area is not anticipated to expand SRPD's service area, which could increase response times or disrupt other performance objectives.

As described in Section 4.15.2.2, Existing Conditions, the new Public Safety Center was constructed to house several essential City facilities and includes a new police headquarters to replace the prior headquarters on the first floor of City Hall, which was inadequate to meet the needs of the SRPD. The Public Safety Center provides a facility that is adequate for both current and future needs of the SRPD. While, as discussed in Section 4.15.2.2, Existing Conditions, there is an ongoing need for training; new equipment and technology; and resources to support crime prevention, response capacity, and investigations, the current facilities are adequate to maintain acceptable service ratios, response times, or other performance objectives.

Buildout of the proposed General Plan 2040 is projected to occur over a 20-year horizon. While an increase in demand for police protection services would be gradual and is in line with incremental population growth, which would occur with or without adoption of the proposed General Plan 2040, the SRPD identified that their staffing level has substantially decreased since 2008–2009,¹⁷ and an increase in population would result in a need for increased staffing.¹⁸ As previously described, the SRPD staffing ratios for sworn officers to 10,000 residents and total staff to 10,000 residents is below the national staffing average (national average: 16.1 sworn personnel per 10,000 residents and 20.7 total personnel per 10,000 residents, compared to SRPD: 11 sworn officers per 10,000 residents¹⁹ and 15.2 total personnel per 10,000 residents).²⁰

As previously described, the SRPD is funded by the City's Municipal Fund and the Public Safety Fund, which potential future development would support through the payment of taxes and development fees, amongst other fees. Future development in San Rafael would be required to pay taxes and development

¹⁷ Diana Bishop, the Police Chief of the San Rafael Police Department (SRPD), November 2020.

¹⁸ Glen McElderry, the Police Captain of the San Rafael Police Department (SRPD), November 2020.

¹⁹ $75,751 \text{ current residents} / 10,000 = 7.5751$; $66 \text{ full-time sworn officers} / 7.5751 = 8.7 \text{ full-time sworn officers to } 10,000 \text{ residents}$.

²⁰ $75,751 \text{ current residents} / 10,000 = 7.5751$; $91 \text{ total staff} / 7.5751 = 12 \text{ total staff to } 10,000 \text{ residents}$.

PUBLIC SERVICES AND RECREATION

fees, amongst other fees, that would contribute to the Municipal Fund and Public Safety Fund to support the SRPD. Like the SRFD, procurement of additional police equipment would occur as needed through the City's annual budgeting process, which financially supports the procurement of needed equipment.

The proposed Community Services and Infrastructure (CSI) Element contains goals, policies, and programs that require local planning and development decisions to consider and mitigate impacts that potential future development could have on public service facilities. In addition to the goals, policies, and programs listed in Impact Discussion PS-1, the following policy and programs would serve to reduce impacts specific to SRPD facilities and services in the EIR Study Area:

Goal CSI-3: Exceptional Public Safety Services. Provide and maintain exceptional fire, public safety, and paramedic services.

- **Policy CSI-3.1: Investment in Public Safety Services.** Maintain cost-effective police, fire protection, and paramedic facilities, equipment, and services. Manage increases in costs through effective preventative measures, such as fire prevention and community policing.
 - **Program CSI-3.1A: Police Department Strategic Plan.** Develop a Strategic Plan for police services to evaluate trends, establish goals, prioritize future actions, determine budget needs, and align services with other City departments. The Plan should include a proactive response to issues related to social justice and compassionate law enforcement. Engage the community, including local businesses, in this process.
 - **Program CSI-3.2A: Crime Prevention through Environmental Design.** Design new public and private development to achieve “eyes on the street,” including site planning, lighting, landscaping, and architectural design features that reduce the potential for crime.
- **Policy CSI-3.4: Quality of Life Programming.** Maintain programs to proactively address quality of life issues, such as peace disturbances, loitering, littering, and vandalism. Focus on personal contact with residents and businesses and build positive relationships with all segments of the community.

Consequently, compliance with local regulations, coupled with increased revenue to be generated by new development for investment in police staff and equipment, would enable continuation of current operating procedures. Because no new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives are required, impacts to the SRPD from the adoption and implementation of the proposed General Plan 2040, impacts are *less than significant*.

Significance without Mitigation: Less than significant.

Downtown Precise Plan

Like potential future development in the remainder of the city, potential future development in the Downtown Precise Plan Area would occur on a limited number of vacant parcels and in the form of infill/intensification on sites either already developed and/or underutilized, and/or in close proximity to existing residential and residential-serving development. The SRPD provides police protection services in the entirety of the Downtown Precise Plan Area. The newly completed Public Safety Center is in the northern portion of the Downtown Precise Plan Area and houses the SRPD headquarters. The proposed

PUBLIC SERVICES AND RECREATION

Downtown Precise Plan has no specific policies, and the Downtown Code has no specific regulations related to police protection services. All potential future development would be required to comply with the proposed General Plan 2040 goals, policies, and programs listed above and would be required to comply with the same State and local regulations listed in Section 4.15.2.2. Therefore, the impacts described for the proposed General Plan 2040 would also apply in the Downtown Precise Plan Area. Accordingly, like the General Plan 2040, impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

PS-4	Implementation of the proposed project could result in a cumulatively considerable impact to police services.
-------------	--

The geographic context for cumulative police service impacts would occur from potential future development within the EIR Study Area and adjoining jurisdictions. The 2040 General Plan does not include specific development projects, as it serves as a guide for future development in the City. Future development projects are currently and will continue to be assessed for impacts to police protection services.

It is unlikely that approval of the General Plan and certification of the EIR would immediately increase the degree or incidence of need for police protection services because anticipated growth under the proposed project is projected to occur incrementally throughout the 20-year buildout horizon. Additionally, compliance with the proposed General Plan 2040 goals, policies, and programs listed under Impact Discussion PS-3 would reduce the impact that potential future development could have on SRPD, the Marin County Sheriff Department, and the California Highway Patrol. Additionally, development would occur on a limited number of vacant parcels and in the form of infill/intensification on sites either already developed and/or underutilized, and/or in close proximity to existing residential and residential-serving development and which are covered by existing police services. Therefore, the proposed project would not result in a cumulatively considerable impact to police protection services and cumulative impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

4.15.3 SCHOOLS

4.15.3.1 ENVIRONMENTAL SETTING

Regulatory Framework

State Regulations

California Government Code, Section 65995(b), and Education Code Section 17620

Senate Bill (SB) 50 amended California Government Code Section 65995, which contains limitations on Education Code Section 17620, the statute that authorizes school districts to assess development fees

PUBLIC SERVICES AND RECREATION

within school district boundaries. Government Code Section 65995(b)(3) requires the maximum square footage assessment for development to be increased every two years, according to inflation adjustments. According to California Government Code Section 65995(3)(h), the payment of statutory fees is “deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization...on the provision of adequate school facilities.” The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

Senate Bill 50

SB 50 (funded by Proposition 1A, approved in 1998) limits the power of cities and counties to require mitigation of school facilities impacts as a condition of approving new development and provides instead for a standardized developer fee. SB 50 generally provides for a 50/50 State and local school facilities funding match. SB 50 also provides for three levels of statutory impact fees. The current maximum allowable fee is \$3.79 per square foot for residential development and \$0.61 per square foot for commercial and industrial development. In setting the fees, school districts must prepare nexus studies to demonstrate a reasonable connection between new development and the need for school improvements. The fees may only be used to finance the construction or modernization of school facilities. The fee application level depends on whether State funding is available, whether the school district is eligible for State funding, and whether the school district meets certain additional criteria involving bonding capacity, year-round school, and the percentage of moveable classrooms in use.

Mitigation Fee Act (California Government Code 66000-66008)

Assembly Bill (AB) 1600, the Mitigation Fee Act, requires a local agency establishing, increasing, or imposing an impact fee as a condition of development to identify the purpose of the fee and the use to which the fee is to be put.²¹ The agency must also demonstrate a reasonable relationship between the fee and the purpose for which it is charged, and between the fee and the type of development project on which it is to be levied. This act became enforceable on January 1, 1989.

Local Regulations

San Rafael General Plan 2020

The City of San Rafael 2020 General Plan goals, policies, and programs that are relevant to schools are primarily in the Land Use, Neighborhoods, Parks and Recreation, Economic Vitality, and Governance Elements. As part of the proposed project, some existing General Plan goals, policies, and programs would be amended, substantially changed, or new policies would be added. A comprehensive list of updated goals, policies, and programs is provided in Appendix B, Proposed General Plan Goals, Policies, and Programs, of this Draft EIR. Applicable goals, policies, and programs are identified and assessed for their

²¹ California Legislative Information, California Law, Code Section Group, Government Code Sections 66000-66008, https://leginfo.ca.gov/faces/codes_displayText.xhtml?lawCode=GOV&division=1.&title=7.&part=&chapter=5.&article= accessed on April 8, 2020.

PUBLIC SERVICES AND RECREATION

effectiveness and potential to result in an adverse physical impact later in this chapter under Section 4.15.3.4, Impact Discussion.

4.15.3.2 EXISTING CONDITIONS

The analysis in this section is based on the *Community Services Background Report: San Rafael General Plan 2040*, prepared by the San Rafael Community Development Department in February 2020.

Information was provided through correspondence between Barry Miller, San Rafael General Plan 2040 Project Manager, and school district representatives, including Daniel Zaich, Senior Director of Capital Facilities at San Rafael City Schools, and Becky Rosales, Superintendent at Miller Creek School District (MCSD).

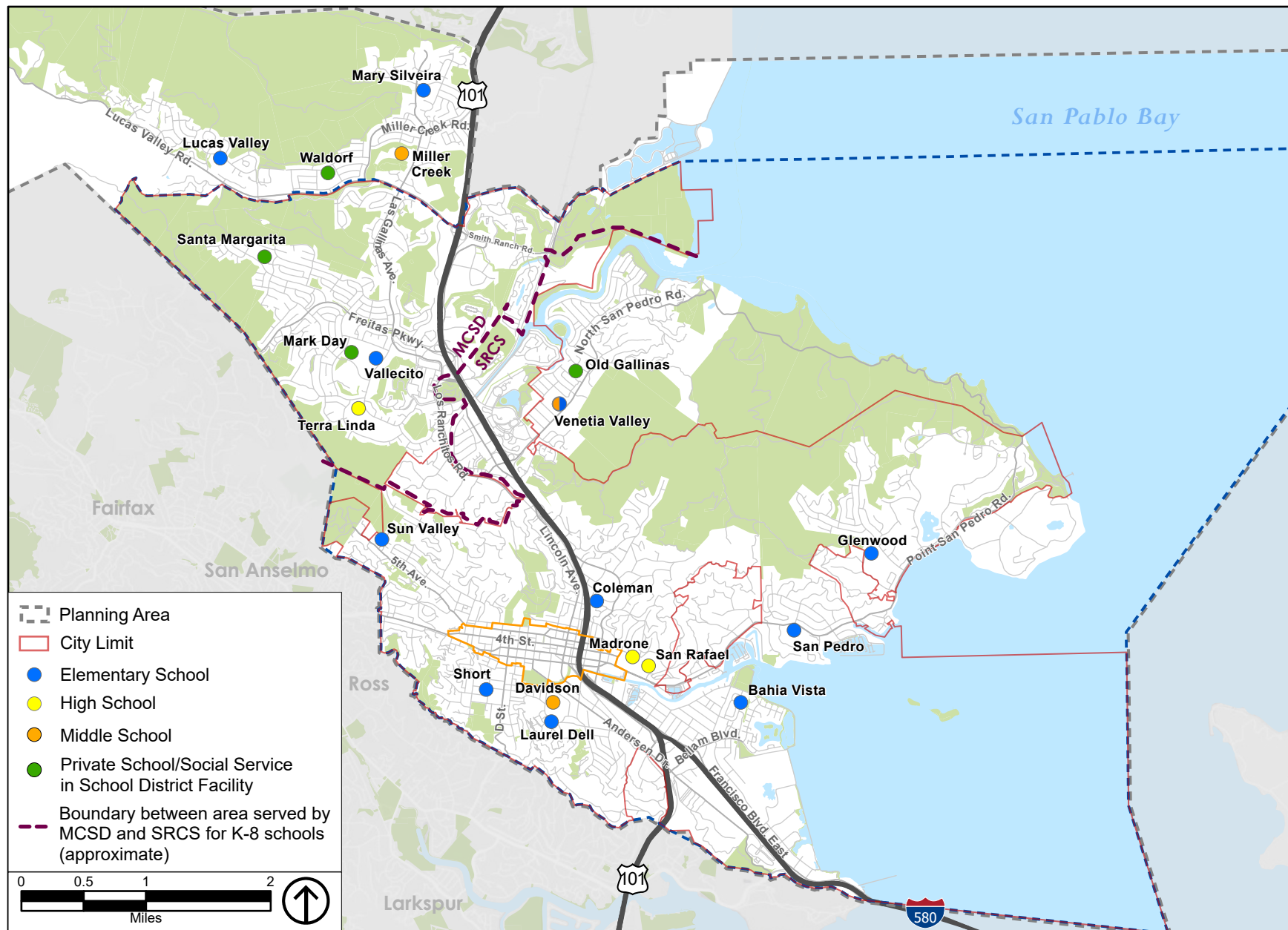
Overview

The EIR Study Area is served the San Rafael City Elementary School District, the San Rafael City High School District, and the MCSD, shown on Figure 4.15-2. The Downtown Precise Plan Area is served by the San Rafael City Schools (SRCS) districts. Under the San Rafael City Charter, SRCS includes a separate elementary school district and high school district, which accounts for two of the three school districts in the EIR Study Area. The SRCS elementary school district covers the southern portion of the EIR Study Area, while the SRCS high school district covers the entire EIR Study Area. Both districts also encompass portions of unincorporated Marin County.²² Both the SRCS elementary and high school districts are governed by the same five-member Board of Trustees. The MCSD serves elementary and middle school students in the northern part of the EIR Study Area, including the unincorporated neighborhoods of Los Ranchitos, Lucas Valley, and Marinwood. Students graduating from MCSD middle schools populate high schools operated by SRCS.

The names, locations, and grades of each school in the three school districts are shown in Table 4.15-2. The 11 kindergarten through eighth-grade properties within the SRCS district include a cumulative total of 462,892 square feet of building space on about 75 acres of land. SRCS additionally owns two closed school campuses. One of the two closed campuses has been repurposed as a children's center and the other remains unoccupied. The three high schools operated by SRCS include a total of 487,783 square feet of building space on about 60 acres of land. Two of the high schools, San Rafael High School and Madrone Continuation School, share a campus to the east of the Downtown Precise Plan Area boundary. The SRCS corporation yard and maintenance building are also located on this campus. Terra Linda High School in northern San Rafael also houses the SRCS administrative offices. The MCSD office is in northern San Rafael, on a former elementary school site. Total enrollment for the 2018 to 2019 school year was 4,614 students for the SRCS elementary and middle schools, 2,640 students for the SRCS high schools, and 1,982 students for the MCSD elementary and middle schools. The total number of kindergarten level through twelfth-grade public school students in the EIR Study Area for the 2018 to 2019 school year was 9,236 students. These figures exclude students attending private schools.

²² The SRCS Elementary School District also serves unincorporated neighborhoods, including Santa Venetia, Country Club, and Bayside Acres. It also serves San Quentin Village and a small portion of Larkspur. The High School District serves these areas and also serves Terra Linda, Marinwood, and other parts of northern San Rafael.

PUBLIC SERVICES AND RECREATION



Source: ESRI, 2017; County of Marin, 2009; City of San Rafael, 2019; PlaceWorks, 2019.

Figure 4.15-2
School District Boundaries and Locations of Schools

PUBLIC SERVICES AND RECREATION

TABLE 4.15-2 SAN RAFAEL SCHOOL DISTRICTS AND SCHOOLS

School Name	Location	Grade
<i>San Rafael City Schools</i>		
Bahia Vista Elementary School	125 Bahia Vista Way	K-5
Coleman Elementary School	800 Belle Avenue	K-5
Glenwood Elementary School	25 W Castlewood Drive	K-5
Laurel Dell Elementary School	225 Woodland Avenue	K-5
San Pedro Elementary School	498 Point San Pedro Road	K-5
Short Elementary School	35 Marin Street	K-5
Sun Valley Elementary School	75 Happy Lane	K-5
Davidson Middle School	280 Woodland Avenue	6-8
Venetia Valley School	177 N San Pedro Road	K-8
San Rafael High School	153 3 rd Street	9-12
Madrone Continuation School	185 Mission Avenue	9-12
Terra Linda High School	320 Nova Albion Way	9-12
<i>Miller Creek School District</i>		
Vallecito Elementary School	50 Nova Albion Way	K-5
Mary Silveira Elementary School	375 Blackstone Drive	K-5
Lucas Valley Elementary School	1175 Idylberry Road	K-5
Miller Creek Middle School	2255 Las Gallinas Avenue	6-8
Waldorf School ^a	755 Idylberry Road	K-8
Mark Day School ^a	39 Trellis Drive	K-8
Santa Margarita School ^b	1055 Las Ovejas Avenue	K-8
<i>Privately Owned Schools (partial list)</i>		
Montessori Terra Linda School	610 Del Ganado Road	K-6
Saint Isabella School	1 Trinity Way	K-8
Saint Raphael School	1100 Fifth Street	K-8
Gate Academy	1 St. Vincents Drive	K-8
Marin Montessori Junior High	1 St. Vincents Drive	6-8
Marin Academy	1600 Mission Avenue	9-12
Brandeis Marin	180 North San Pedro Road	K-8

Notes:

a. This school is owned by the Miller Creek School District but is operated privately.

b. This school is a Children's Center owned by Miller Creek School District but is operated privately.

Source: City of San Rafael, 2020.

Enrollment Trends

Table 4.15-3 shows enrollment trends at SRCS elementary and high schools, and at MCSD schools between 2014 and 2019, which indicates enrollment has been stable at the elementary and middle school level and has gradually increased at the high school level. The number of students in the SRCS and MCSD elementary schools declined by less than one percent over the five-year period, while the number of high school students increased by 11.63 percent.

PUBLIC SERVICES AND RECREATION**TABLE 4.15-3 SCHOOL ENROLLMENT BY DISTRICT, 2014 TO 2019**

School Year	SRCS- Elementary and Middle School	SRCS- High School	MCSD
2014 to 2015	4,635	2,365	1,999
2015 to 2016	4,749	2,420	1,989
2016 to 2017	4,758	2,519	1,982
2017 to 2018	4,730	2,648	1,984
2018 to 2019	4,614	2,640	1,982
<i>Percent Change</i>	<i>-0.45 percent</i>	<i>+11.63 percent</i>	<i>-0.85 percent</i>

Source: California Department of Education Data Quest, 2020.

Facility Improvements and Funding

Facility conditions in both SRCS and MCSD schools were assessed through two plans, the *SRCS Master Facilities Plan*, and the *MCSD Facilities Master Plan*, prepared in 2014. The two facility plans evaluated the condition of each school facility, identified needs for replacement and modernization, as well as for administrative and operational space, common spaces, and space for students with special needs. Additional goals in sustainability, technology, efficiency, and equity were evaluated. An important objective of the two facility plans was to establish parity among schools and recognize that some schools may be in greater need of additional amenities and new facilities than others. The two facility plans provided the foundation for voter-approved bond measures that are now facilitating capital improvements in all three districts. The plans identified a number of ways to meet these costs, including local general obligation bonds, proceeds from State bonds, grants, developer fees, and other sources.

San Rafael City Schools

The *SRCS Master Facilities Plan* found that SRCS has the capacity for 4,755 students in 187 standard classrooms serving grades kindergarten through eighth grade and 2,244 students in 96 classrooms serving grades 9 through 12. Based on 2018 to 2019 school year enrollment numbers shown in Table 4.15-3, the elementary and middle schools are operating at slightly below capacity, while the high schools are operating above capacity. The *SRCS Master Facilities Plan* explored different options for balancing enrollment and expanding campuses to avoid overcrowding. Such options include reopening closed campuses, expanding existing schools, and shifting students between campuses.

In November 2015, SRCS placed measures on the San Rafael ballot to raise bond money needed to meet the needs identified by the *SRCS Master Facilities Plan*. Voters subsequently approved Measures A and B, which approved the funding. Measure A included \$108 million for updates to the SRCS elementary and middle schools, while Measure B included \$161 million for the SRCS high schools. Among the funded projects are new high school science labs, updated core academic facilities, new classrooms, dedicated art and music spaces, and upgraded technology infrastructure. As of January 2020, most of these projects have been completed, with the remainder expected to be finished by early 2021. A description of each school facility, including completed or overdue modernization, is provided in the *Community Services Background Report: San Rafael General Plan 2040*.

PUBLIC SERVICES AND RECREATION

Miller Creek School District

The *MCSD Facilities Master Plan* includes an assessment of Mary Silveira, Vallecito, and Lucas Valley Elementary Schools, as well as Miller Creek Middle School. The *MCSD Facilities Master Plan* identifies the needs for each campus, and for MCSD as a whole. Districtwide needs include replacement clock, bell, intercom, and alarm systems, aging utility services, and outdated data networks and technology. Modernization programs in the early 2000s alleviated these deficiencies to some extent, but additional work was deemed necessary in the *MCSD Facilities Master Plan*. MCSD also has a large number of portable classrooms due to insufficient space.

In 2014, MCSD placed measures on the San Rafael ballot to raise bond money needed to meet the needs identified by the *MCSD Facilities Master Plan*. Voters subsequently approved Measure C to approve the funding. The measure authorized \$30 million in general obligation bonds to address deficiencies identified in the *MCSD Facilities Master Plan*. Funds have been used to update aging classrooms technology, update middle school science classrooms, upgrade electrical wiring, improve campus safety and security, and generally upgrade campus and classroom facilities. A description of each school facility, including completed or overdue modernization, is provided in the *Community Services Background Report: San Rafael General Plan 2040*.

Student Generation Factors

Student generation rates (or “yields”) are used by school districts to estimate the probable number of students in a “typical” single-family or multi-family home. This data is used to estimate the expected impact of new housing units on school enrollment, which in turn helps inform facility planning and fee collection. The rates are typically based on data for student yields from existing homes in each district or based on State standards. As shown in Table 4.15-4, multi-family housing in San Rafael yields nearly twice the number of students per unit as single-family housing. The number of students per dwelling unit in San Rafael averages roughly 0.3 students per unit, compared to a 0.7 statewide yield.

TABLE 4.15-4 STUDENT GENERATION FACTORS FOR SAN RAFAEL CITY SCHOOLS

	Single-Family Units (students per new unit)	Multi-family Units (students per new unit)
SRCS Elementary Schools (K–5)	0.1069	0.2273
SRCS Middle Schools (6–8)	0.0453	0.0980
SRCS High School (9–12)	0.0769	0.1108
Total	0.2291	0.4361

Source: City of San Rafael, 2020.

School Impact Fees

SRCS and MCSD collect development impact fees based on forecasts calculated with projected increments of residential growth within the EIR Study Area. Fees are collected for new residential units and for residential additions of 500 square feet or more, commercial and industrial development, as well as development of new hotels.

PUBLIC SERVICES AND RECREATION

The fees collected by SRCS are split into elementary school fees and high school fees. As of 2018, the elementary and middle school fees for both SRCS and MCSD were \$2.62 per square foot for residential development and \$0.42 per square foot for commercial and industrial development. The SRCS development impact fee is reduced to \$0.245 per square foot for hotels and motels, and \$0.14 per square foot for self-storage. The high school fees are \$1.17 per square foot for residential development, \$0.19 per square foot for commercial and industrial development, \$0.124 per square foot for hotels and motels, and \$0.06 per square foot for self-storage.

The actual cost of constructing facilities to serve new students exceeds the amount that would be generated by these fees. Other funding sources, such as local bond measures and State grants, are often sought to cover capital costs. Moreover, student enrollment is dynamic and depends on many factors besides new construction. This is particularly true in San Rafael, where enrollment declined dramatically in the 1980s, even as housing construction was robust. Enrollment has increased since 2010, largely due to an increase in household sizes and not because of new construction.

Fee Justification Study

In a 2018 Fee Justification Study, SRCS applied the student generation rates shown in Table 4.15-4 to ABAG/MTC projected increments of growth between 2018 and 2040. The intention behind the Fee Justification Study is to project student enrollment increases to ensure adequate funding is secured to accommodate that increase. The Fee Justification Study for the SRCS high school district identified the potential for 2,350 new residential units citywide, including 966 single-family units and 1,384 multifamily units, which resulted in a projection of 227 new high school students.

For kindergarten through eighth grade students, SRCS identified the potential for 660 single-family and 946 multi-family units. The number of units is lower than the high school forecasts because K through 8 students in a portion of the city are served by the MCSD. The projections indicated 286 kindergarten through fifth grade students and 123 students in grades six through eight at SRCS schools. Applying the same multipliers to the portion of San Rafael in the MCSD yields 132 kindergarten through fifth-grade students and 62 students in grades six through eight in the MCSD.

4.15.3.3 STANDARDS OF SIGNIFICANCE

Pursuant to Appendix G, Environmental Checklist Form, of the CEQA Guidelines, implementation of the proposed project would have a significant impact related to public school services if it would:

1. Result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives for public school services.
2. Result significant cumulative impacts with respect to public school services.

PUBLIC SERVICES AND RECREATION

4.15.3.4 IMPACT DISCUSSION

PS-5	Implementation of the proposed project could result in the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives.
-------------	---

General Plan 2040

This section reviews the need for existing school facilities to accommodate any increases in public school enrollment due to implementation of the proposed General Plan 2040. However, the California State Legislature, under SB 50, has determined that payment of school impact fees shall be deemed sufficient to provide full and complete school facilities mitigation. All potential future developments proposed as a result of implementation of the proposed General Plan 2040 would be required to pay school impact fees adopted by each school district. Based on SB 50, this requirement would fully mitigate the impacts of the proposed General Plan 2040 on school facilities.

San Rafael City Schools

Implementation of the proposed General Plan 2040 is projected to generate approximately 4,460 housing units in the EIR Study Area. This could potentially result in an increase of 1,014 students in elementary schools and 437 students in middle schools, using the generation factors outlined in Table 4.15-4.²³ However, both SRCS and MCSD serve elementary and middle school students in the EIR Study Area, and they would subsequently split the share of this student increase. As shown in Table 4.15-3, School Enrollment by District 2014 to 2019, there are a total of 6,596 students in elementary and middle school in the EIR Study Area. Of these students, 30 percent are within the MCSD, while 70 percent are in SRCS.²⁴ Therefore, using the same proportional distribution, as well as the approximate distribution of development opportunities in the city, SRCS' share of the additional students would be 710 elementary students and 306 middle school students. High school students are expected to increase by approximately 243 students.

With student enrollment in the elementary and middle schools nearing capacity and student enrollment in high schools exceeding capacity, the additional students would exacerbate the overall capacity pressure of existing SRCS facilities. To accommodate new students, the SRCS would need to either expand existing facilities or construct new schools. Such expansions and considerations for upgrading existing facilities has partly occurred, and continues to occur, as identified in the *SRCS Master Facilities Plan*, described in Section 4.15.3.2, Existing Conditions. The *SRCS Master Facilities Plan* explores different options for balancing enrollment and expanding campuses to avoid overcrowding. Such options include reopening

²³ Using student generation factors from Table 4.15-3, calculated as follows: (Elementary Schools- 0.2273 x 4,460 = 1,014); (Middle Schools- 0.0980 x 4,460 = 437); (High Schools- 0.1108 x 4,460 = 243).

²⁴ Calculated by adding the 4,614 elementary and middle school students in SRCS and the 1,982 elementary and middle school students in the MCSD, and then dividing the number of MCSD students by the total number of students (4,614 + 1,982 = 6,596 total students); ((1,982/6,596) x 100 = 30 percent).

PUBLIC SERVICES AND RECREATION

closed campuses, expanding existing schools, and shifting students between campuses. Most of the improvements are likely to occur on existing sites. The SRCS would continue to collect development impact fees throughout implementation of the proposed General Plan 2040, meaning potential future development would incrementally pay for any needed facility upgrades and expansions, which would mitigate the impacts from the proposed General Plan 2040 per SB 50. Furthermore, Measures A and B have allowed many of the existing schools in the SRCS system to expand or modernize as needed, introducing additional capacity for students to each school. Because potential future development from the proposed General Plan 2040, and subsequent population increases would occur incrementally, SRCS schools would have capacity to serve additional students. Therefore, the impact to SRCS would be *less than significant*.

Miller Creek School District

As described above, implementation of the proposed General Plan 2040 could potentially result in an increase of approximately 304 elementary school students and 131 middle school students in the MCSD by 2040.²⁵ As student enrollment in the MCSD is nearing capacity, these additional students would create a capacity deficiency for the district. Similar to SRCS, the MCSD adopted the *MCSD Facilities Master Plan* in 2014 and had a bond measure (Measure C) approved by voters in 2014 to provide \$30 million in general obligation bonds to address deficiencies identified in the *MCSD Facilities Master Plan*. Funds have been used to update aging classrooms and instructional technology; provide updated middle school science classrooms; upgrade electrical wiring, improve campus safety and security; and repair, construct, acquire, and equip classrooms, sites, and facilities. Similar to SRCS, new development projects pay development impact fees, subsequently relieving capacity issues, which is considered mitigation under SB 50. In addition, environmental impacts from construction of the new facilities would be evaluated by the district. Therefore, impacts resulting from the 2040 General Plan to the MCSD would be *less than significant*. Furthermore, the proposed Land Use (LU) Element and the proposed Community Services and Infrastructure (CSI) Element contain goals, policies, and programs that require local planning and development decisions to consider and mitigate impacts that potential future development could have on school facilities. The following goals, policies, and programs would serve to reduce impacts to school facilities in the EIR Study Area:

Goal LU-1: Well-Managed Growth. Grow and change in a way that serves community needs, improves fiscal stability, and enhances the quality of life.

- **Policy LU-1.16: School Site Reuse or Redevelopment.** In the event a school site is made available for reuse, work with the School District and surrounding community to determine the desired uses. Given the public ownership of the land, uses that provide a public benefit should receive priority. This includes affordable housing, childcare facilities, neighborhood parkland, and facilities that accommodate public and quasi-public uses, such as adult day care, education, recreation, arts and cultural programs.

²⁵ MCSD did not provide student generation factors. For the purposes of this EIR evaluation, student generation factors provided by SRCS in Table 4.15-3 are being applied, calculated as follows: (Elementary Schools- 0.2273 x 2,200 = 500.6); (Middle Schools- 0.0980x 2,200 = 215.60).

PUBLIC SERVICES AND RECREATION

- **Program LU-1.16A: Zoning for School Sites.** Continue to implement school site reuse and redevelopment through zoning regulations and the development review process.

Goal CSI-1: Educational Excellence. Promote excellent schools and high-quality, equitable education.

- **Policy CSI-1.5: Campus Land Use and Transportation Issues.** Work with San Rafael City Schools, the Miller Creek School District, local private schools, and neighborhood organizations to address traffic, parking, and land use issues on and around school campuses.
 - **Program CSI-1.5A: School Construction Projects.** Coordinate with school personnel on campus construction, modernization, and improvement projects.
 - **Program CSI-1.5B: Long-Range Planning and Development Review.** Collaborate with schools on long range planning and development review, including collection of appropriate fees, enrollment projections, and planning for future improvements.

With the required payment of developer impact fees for new development pursuant to SB 50 and the implementation of the proposed General Plan 2040 goals, policies, and programs that support school facilities in the EIR Study Area, impacts to the SRCS and MCSD would be *less than significant*.

Significance without Mitigation: Less than significant.

Downtown Precise Plan

The Downtown Precise Plan Area is an existing urban area in the city of San Rafael where roughly half of the anticipated development by 2040 is expected to occur. Buildout of the Downtown Precise Plan is expected to result in an increase of approximately 2,200 residential units and 3,570 residents by 2040. If SRCS multipliers are applied to these unit counts, the population increase would result in an increase of 716 students to SRCS elementary and middle schools and 244 students to the SRCS high schools.²⁶ The proposed Downtown Precise Plan has no specific policies, and the Downtown Code has no specific regulations related to school services. All potential future development would be required to comply with the proposed General Plan 2040 goals, policies, and programs listed herein and pay developer impact fees for new development pursuant to SB 50. Therefore, the impacts described for the proposed General Plan 2040 would also apply in the Downtown Precise Plan Area. Accordingly, like the General Plan 2040, impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

PS-6	Implementation of the proposed project could result in a cumulatively considerable impact to school services.
-------------	--

As discussed in Section 4.15.3.2, Existing Conditions, and in Impact Discussion PS-5, a majority of schools in the EIR Study Area are close to or exceeding capacity, and additional student enrollment due to the

²⁶ Using student generation factors from Table 4.15-3, calculated as follows: (Elementary Schools- 0.2273 x 2,200 = 500); (Middle Schools- 0.0980 x 2,200= 216); (High Schools- 0.1108 x 2,200 = 244).

PUBLIC SERVICES AND RECREATION

implementation of the proposed project would exacerbate the capacity issue. However, according to the *SRCS Master Facilities Plan* and the *MCSD Facilities Master Plan*, existing schools are slated to be expanded or renovated if they have not already been in the past several years. These projects would be funded by bond measures discussed in Impact Discussion PS-5 and development impact fees from potential future development, which would mitigate the current and future capacity issues per SB 50. Therefore, the proposed project would not result in a cumulatively considerable impact to school facilities and cumulative impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

4.15.4 LIBRARIES

4.15.4.1 ENVIRONMENTAL SETTING

Regulatory Framework

Local Regulations

San Rafael General Plan 2020

The City of San Rafael 2020 General Plan goals, policies, and programs that are relevant to libraries are primarily in the Neighborhoods and Culture and Arts Elements. As part of the proposed project, some existing General Plan goals, policies, and programs would be amended, substantially changed, or new policies would be added. A comprehensive list of updated goals, policies, and programs is provided in Appendix B, Proposed General Plan Goals, Policies, and Programs, of this Draft EIR. Applicable goals, policies, and programs are identified and assessed for their effectiveness and potential to result in an adverse physical impact later in this chapter under Section 4.15.4.4, Impact Discussion.

4.15.4.2 EXISTING CONDITIONS

The analysis in this section is based on the *Community Services Background Report: San Rafael General Plan 2040* prepared by the San Rafael Community Development Department in February 2020. Information was provided through correspondence between Barry Miller, San Rafael General Plan 2040 Project Manager, and library representatives, including Susan Andrade-Wax, Director of Library and Recreation, and Henry Bankhead, Interim Library Director.

Services

San Rafael's public library system is operated by the City's Library and Recreation Department. The main branch is located adjacent to City Hall in the Downtown Precise Plan Area. There are two satellite branches, the Pickleweed branch located at the Albert Boro Community Center in eastern San Rafael and the Northgate Mall branch located at Northgate Mall in northern San Rafael. The libraries are managed by the City's Library and Recreation Department, which is also responsible for recreation programming, childcare, and arts services. In addition to the City Library system, the County of Marin operates the Civic Center Branch Library at the Marin County Civic Center Building in the EIR Study Area. All seven

PUBLIC SERVICES AND RECREATION

independent public libraries, the Marin County Free Library, as well as the College of Marin and Dominican University, are connected through membership in the MARINet library consortium. The MARINet consortium operates an integrated online library system. The MARINet system provides for the shared use and delivery of all physical library materials as well as some shared e-resources and high-bandwidth network connectivity for the public library members. Each local library pays to be a member of MARINet based on their physical holdings, library budget, and circulation of materials, as defined in the MARINet Joint Powers Agreement (JPA).

Facilities

In 2017, the City completed a comprehensive evaluation of its library facilities and developed a vision for improvement. The process included extensive community input and a comparison of San Rafael's libraries relative to similarly sized San Francisco Bay Area cities. San Rafael has just 0.30 square feet of library space per resident, which is below cities such as South San Francisco, which has 0.64 square feet per resident, Alameda, which has 0.68 square feet per resident, Mountain View, which has 0.77 square feet per resident, and Palo Alto, which has 1.35 square feet per resident. Based on recommended national standards of roughly 0.7 square feet per capita, San Rafael would need an additional 50,000 square feet of library space.

Existing library facilities in San Rafael total approximately 20,000 square feet. The original Downtown Library opened in 1909 as a 5,160-square-foot facility, and later expanded to the current 14,800 square feet by 1976. The Pickleweed branch occupies 2,185 square feet, which primarily serves residents of the Canal neighborhood in eastern San Rafael. The Terra Linda branch was established in northern San Rafael in 2018 as a "pop-up" facility that occupies 3,000 square feet inside the Northgate Mall.

A 2017 assessment of library conditions concluded that, while the Northgate Mall branch is currently meeting the needs of the northern San Rafael communities, both the main branch in the Downtown Precise Plan Area and the Pickleweed branch in eastern San Rafael are deficient in meeting the needs of the City and adjacent neighborhoods.²⁷ The 2018–2019 San Rafael Public Library Facilities Planning Study looked at cost options for improving library facilities in Central San Rafael, North San Rafael, and an expansion of the Pickleweed branch in East San Rafael. A second study in 2019, the Existing Facilities Report, assessed the existing main branch for code compliance and the cost of essential improvements for meeting long-range needs.²⁸ These alternatives are discussed further under Impact Discussion PS-7.

Funding

The City's Municipal General Fund supports essential City services such as police and fire protection, building and street maintenance, libraries, recreation, and parks and open space maintenance. Current

²⁷ City of San Rafael, July 2019, San Rafael Public Library Facilities Planning Project Existing Facilities Report, <https://storage.googleapis.com/proudcity/sanrafaelca/uploads/2019/09/Existing-Facilities-Report.pdf>, accessed on December 2, 2020.

²⁸ Noll and Tam Architects, August 2019, San Rafael Public Library Facilities Planning Study, City of San Rafael, <https://storage.googleapis.com/proudcity/sanrafaelca/uploads/2019/09/SRPL-Facilities-Planning-Study-August-2019.pdf>, accessed on April 7, 2020.

PUBLIC SERVICES AND RECREATION

services for the MARINet online library system, which links Marin County libraries, are paid for separately by each individual member's annual fee. Additionally, a library special parcel Tax Measure was instituted in 2010 and extended in 2017 to supplement library services. The parcel tax is intended to be used "to maintain library hours, equipment, materials, and services for children, teens, and adults."

4.15.4.3 STANDARDS OF SIGNIFICANCE

Pursuant to Appendix G, Environmental Checklist Form, of the CEQA Guidelines, implementation of the proposed project would have a significant impact related to library services if it would:

1. Result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library services.
2. Result in significant cumulative impacts with respect to library services.

4.15.4.4 IMPACT DISCUSSION

PS-7	Implementation of the proposed project could result in the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives.
-------------	--

General Plan 2040

Implementation of the proposed General Plan 2040 is anticipated to add an additional 8,910 residents to the EIR Study Area by 2040, which would subsequently increase the demand for library services. An overall increase in residents is expected to occur with or without implementation of the proposed General Plan 2040. Service growth under the proposed General Plan 2040 would occur incrementally throughout the 20-year horizon; therefore, potential impacts resulting from increased demand for library services would not occur immediately or at once. However, existing City library facilities have been identified as insufficient to meet existing populations, and a population increase would exacerbate this deficiency.

As discussed in Section 4.15.4.2, Existing Conditions, a 2019 Library Assessment was completed to identify possible solutions to expanding library facilities in the city. Alternative locations were proposed and assessed for each library branch, as well as the estimated funding cost each would require.²⁹

The three options for relocating the main branch include expansion of the current facility adjacent to City Hall, a new facility at Boyd Park, or a renovated joint community center and library at Albert Park. All these sites are centrally located and relatively easy to access by a variety of travel modes. The expansion and

²⁹ Noll and Tam Architects, August 2019, *San Rafael Public Library Facilities Planning Study*, City of San Rafael, <https://storage.googleapis.com/proudcity/sanrafaelca/uploads/2019/09/SRPL-Facilities-Planning-Study-August-2019.pdf>, accessed on April 7, 2020.

PUBLIC SERVICES AND RECREATION

remodel of the existing facility would result in a 27,000-square-foot facility at a cost of \$34 million. The Boyd Park option would result in a 20,000-square-foot facility for \$23 million and would require the demolition of the existing tennis courts and the construction of underground parking. The Albert Park option, which was recommended by staff, would result in a 26,000-square-foot facility (plus another 17,700 square feet of renovated community center space) and would cost \$43 million. This location has been determined to have the greatest potential to benefit the community and would enable “economies of scale” due to its co-location with the community center and recreation program space.

The three options for the Northgate Mall branch would include a permanent location at Northgate Mall, the MCSD administrative offices site, or the Terra Linda Community Center. The latter two options would likely require construction of a new building, whereas the former would repurpose existing space within Northgate Mall. The Northgate Mall option has been identified as the preferred option, as a permanent library of up to 11,000 square feet could be constructed within the mall by repurposing existing retail space for significantly less than the estimated \$1 million to \$5 million cost of complete refurbishment.

Improvements to the Pickleweed branch could occur by expanding the existing Albert Boro Community Center by approximately 5,000 square feet, creating a new 7,000-square-foot library. The expanded facility would include program space for children, teens, and senior activities. An additional 36 parking spaces would be provided. The cost of this option was estimated to be \$7.4 million. A more cost-effective option included repurposing space in the existing Albert Boro Community Center for shared library and recreation use. This second alternative would be more affordable and would preserve a barbecue and picnic area in Pickleweed Park that would otherwise be displaced by the expanded building.

In addition to facility upgrades, improvements are needed to expand the diversity in collection formats and new technologies. As described previously, both the City’s Municipal General Fund and a special annual parcel tax dedicated to public library services and facilities, equipment, and technology improvements would pay for these improvements.

The proposed Community Services and Infrastructure (CSI) Element contains a goal, policies, and programs that require local planning and development decisions to consider and mitigate impacts that potential future development could have on library facilities. The following goals, policies, and programs would serve to ensure adequate library facilities in the EIR Study Area:

Goal CSI-2: Modern, Welcoming Libraries that Meet Community Needs. Enhance library services and facilities to meet the informational and recreational needs of the community.

- **Policy CSI-2.1: Library Facilities.** Improve library facilities to meet current and future needs and recognize the changing role of libraries in community life.
 - **Program CSI-2.1A: New Main Library.** Fund, develop, and construct a new Main Library designed to provide adequate space for collection materials, City programs, public meeting rooms and technology, seating for visitors, and services for special user groups such as children and teens. Develop adaptive reuse plans for the historic Carnegie Library as part of library planning.
- **Policy CSI-2.2: Branch Libraries.** Expand community-based library services in East and North San Rafael to ensure that library services are accessible to everyone in the community.

PUBLIC SERVICES AND RECREATION

- **Program CSI-2.2A: Pickleweed and Northgate Libraries.** Modernize and expand the Pickleweed and Northgate Libraries so they are adequately equipped to deliver the services needed in the surrounding communities.
- **Program CSI-2.2B: School Libraries.** Consider partnerships with the school district to make high school libraries available to the public.

In summary, the existing library system does not have adequate capacity to accommodate growth over the 20-year horizon of the proposed General Plan 2040 and the expansion of existing library facilities or the construction of new facilities would be required. Potential future development in the city, like existing development, would pay the required parcel taxes and other taxes that go to the General Fund and the special library fund to offset impacts to library services. New facilities that may be proposed over the lifetime of the proposed General Plan 2040 would be required to conduct their own individual environmental review, which would analyze each facility's impact on the physical environment. The estimated timing or location of such facilities, or the exact nature of these facilities are not known, so project-specific environmental impacts that would occur from their construction and operation cannot be determined at this time. However, such impacts would be project-specific, and would require permitting and review in accordance with CEQA, which would ensure that any environmental impacts are disclosed and mitigated to the extent possible. In addition, proposed General Plan 2040 Program CSI-2.1A: New Main Library, requires the City to fund, develop, and construct a new Main Library designed to provide adequate space for collection materials, City programs, public meeting rooms and technology, seating for visitors, and services for special user groups such as children and teens, as well as to develop adaptive reuse plans for the historic Carnegie Library as part of library planning. This EIR is a programmatic document and does not evaluate the environmental impacts of future project-specific development. Therefore, the impact is *less than significant*.

Significant with Mitigation: Less than Significant.

Downtown Precise Plan

The proposed Downtown Precise Plan has no specific policies, and the Downtown Code has no specific regulations related to library services. All potential future development would be required to pay parcel taxes as with development in the remainder of the City, which would offset their fair share of impact to the library system. Therefore, the impacts described for the proposed General Plan 2040 would also apply in the Downtown Precise Plan Area. Accordingly, like the proposed General Plan 2040, impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

PS-8	Implementation of the proposed project could result in a cumulatively considerable impact to libraries.
-------------	--

The geographic context for the cumulative library impacts would occur from potential future development under the proposed project, combined with impacts of development on lands adjacent to the city.

PUBLIC SERVICES AND RECREATION

A significant cumulative environmental impact would result if this cumulative growth would exceed the ability of San Rafael libraries to adequately serve the EIR Study Area, thereby requiring construction of new facilities or modification of existing facilities. As described in Impact Discussion PS-7, existing facilities are already not meeting the demands of the city and the payment of taxes as well as the implementation of proposed General Plan 2040 Program CSI-2.1A: New Main Library, would ensure adequate library services over the course of the General Plan buildout. Therefore, the proposed project would not result in a cumulatively considerable impact to library services and cumulative impacts would be *less than significant*.

Significance with Mitigation: Less than significant.

4.15.5 PARKS AND RECREATION

4.15.5.1 ENVIRONMENTAL SETTING

Regulatory Framework

State Regulations

The Quimby Act

The Quimby Act of 1975 authorizes cities and counties to pass ordinances requiring developers to set aside land, donate conservation easements, or pay fees for park improvements. The Quimby Act sets a standard park space to population ratio of 3 acres of park space per 1,000 persons. Cities with an existing ratio of higher than three acres per 1,000 persons can set a standard of up to 5 acres per 1,000 persons for new development.³⁰ The calculation of a city's park space to population ratio is based on a comparison of the population count of the last federal census to the amount of city-owned parkland. A 1982 amendment (AB 1600) requires agencies to clearly show a reasonable relationship between the public need for a recreation facility or park land, and the type of development project upon which the fee is imposed.

Local Regulations

San Rafael General Plan 2020

The City of San Rafael 2020 General Plan goals, policies, and programs that are relevant to parks and recreation are primarily in the Parks and Recreation Element. As part of the proposed project, some existing General Plan goals, policies, and programs would be amended, substantially changed, or new policies would be added. A comprehensive list of updated goals, policies, and programs is provided in Appendix B, Proposed General Plan Goals, Policies, and Programs, of this Draft EIR. Applicable goals, policies, and programs are identified and assessed for their effectiveness and potential to result in an adverse physical impact later in this chapter under Section 4.15.5.2, Impact Discussion.

³⁰ California Government Code Section 66477, California Department of Parks and Recreation website, *Quimby Act 101: An Abbreviated Overview*, <http://www.parks.ca.gov/pages/795/files/quimby101.pdf>, accessed on December 7, 2015.

PUBLIC SERVICES AND RECREATION

San Rafael Municipal Code

The SRMC, organized by title, chapter, and section, includes a provision related to parks and recreation in Title 15, Subdivisions. Specifically, Section 15.09, Park Dedication and In-Lieu Fees, of the SRMC dictates the method by which the City may require that new subdivisions include dedicated parkland, and by which the subdivider can opt to pay parkland in-lieu fees in place of dedicating a portion of their project to parkland. At the time of approval of the tentative map for a residential subdivision, the approving body shall determine the land required for dedication, or the amount of in-lieu fees to be paid. The park land dedication or in-lieu fee that is required to meet the provisions of this chapter is imposed as a condition of approval on the tentative map. At the time of final map or parcel map approval for recordation, the subdivider shall dedicate land, pay a fee in lieu thereof, or a combination of both, at the option of the city, for neighborhood and community park or recreational purposes at the time and according to the standards and formula. In-lieu fee amounts are determined prior to project approval and are generally equal to the value of the land and improvements, which would have been required for dedication. The value of the land shall be determined in accordance with the provisions of fair-market value per buildable parkland acre, decided by a licensed appraiser. The City's current parkland dedication requirement under this ordinance is 3 acres per 1,000 residents.

4.15.5.2 EXISTING CONDITIONS

The analysis in this section is based on the *Parks and Recreation Existing Conditions* report, prepared by the San Rafael Community Development Department in December 2019. Information was provided through correspondence between Barry Miller, San Rafael General Plan 2040 Project Manager, and Susan Andrade-Wax, Director of Library and Recreation.

The City of San Rafael Library and Recreation Department is one of several park service providers in the EIR Study Area. Other service providers include the County of Marin's Open Space District, the California Department of Parks and Recreation, the Marinwood Community Services District, SRCS, and MCSD. Public park services are supplemented by private facilities such as swim and racquet clubs, the Young Men's Christian Association (YMCA) and Osher Marin Jewish Community Center (Osher JCC), private golf courses, and community-run pools and play areas.

Parkland Facilities

Open space and parks make up the largest single category of land use in the EIR Study Area. Although both may be considered "parkland," the analysis in this Draft EIR distinguishes "parks" from "open space." Open space refers to space managed for resource conservation, hazard reduction, and scenic value, while parks refer to land that has been improved in such a way to support active recreation. Typical park improvements include sports fields, playgrounds, picnic areas, tennis courts, running tracks, recreation centers, and basketball courts. Larger parks support programmed services, such as classes, swim and tennis lessons, activities for children and seniors, and league sports. Programs and other recreational services are coordinated by the City's Library and Recreation Department.

For a complete list of all parkland in the EIR Study Area, as well as amenities offered at each park, the City has prepared the *Parks and Recreation Existing Conditions Report*, which is available at the City offices and

PUBLIC SERVICES AND RECREATION

online via the City’s website. The City has applied the parkland classifications used by the National Recreation and Park Association (NRPA) in this report and in General Plan 2040. Parkland classifications, as dedicated by the NRPA, include region-serving parks, community parks, neighborhood parks, pocket parks, special-use parks, and public-school facilities.

The EIR Study Area also includes many areas that are classified as passive open space that are operated by the Marin Open Space District, the State of California, and the City of San Rafael. Passive open space generally refers to open space areas that may be used for recreation such as hiking, mountain biking, or horseback riding. Such areas in the EIR Study Area include the Terra Linda Sleepy Hollow Open Space, and Harry Barbier Memorial Park. These locations include such amenities as staging areas, restrooms, and picnic grounds. Parkland by parkland type, as well as the operator and acreage of each parkland, is outlined in Table 4.15-5. The figures in this table are subject to change through the General Plan adoption process.

TABLE 4.15-5 EIR STUDY AREA PARKLAND OPERATORS AND ACREAGES (EXCLUDES DESIGNATED “OPEN SPACE” AREAS)

Parkland Type	Operator	Acreage
Region- Serving Park	County of Marin	92
Region- Serving Park	State of California	30
Community Parks	City of San Rafael	33.81
Community Parks	Marinwood CSD ^a	14.12
Neighborhood Parks	City of San Rafael	46.53
Neighborhood Parks	County of Marin CSA ^b	2.55
Neighborhood Parks	Marinwood CSD	1.22
Neighborhood Parks	Lucas Valley HOA ^c	1.52
Pocket Parks	City of San Rafael	2.27
Pocket Parks	County of Marin	0.72
Pocket Parks	County CSA	0.88
Special Use Parks	City of San Rafael	30.86
Special Use Parks	County of Marin	2.3
Public School Facilities	SRCS	50.56 (* counted at 50%)
Public School Facilities	MCSD	44.07 (* counted at 50%)
Total	—	306.1

Notes:

^a. CSD= Community Services District

^b. CSA= Community Services Area

^c. HOA= Homeowners Association

Note: Only 50% of the acreage shown for schools is counted in the “Total” row, recognizing that this land is only available for general public use on a limited basis.

Source: City of San Rafael, 2020.

Joint-Use Agreements

The City of San Rafael works with SRCS and MCSD to leverage their properties and facilities for public benefit. Many neighborhoods that lack neighborhood parks, or have small parks without sports fields, rely

PUBLIC SERVICES AND RECREATION

on neighborhood schools for their recreational needs. For instance, facilities at high schools such as specialized swimming pools, tennis courts, and gymnasiums can be made available for public use.

SRCS has adopted provisions for the joint use of school facilities, which includes supervised recreational activities, such as sports league activities. The SRCS has a specific set of priorities for community use, including community-based youth programs, community recreational youth sports leagues, public agency adult recreation and activities, non-profit adult recreation, and individual family use for special events. Fees may be collected by SRCS for the use of their facilities.

The MCS D likewise allows joint use of its facilities, with a permitting process to use the facilities. Reservation of school grounds is only permitted after verifying with the school administrator that the space is available, and that the use would not interfere with regular school activities. Fees may be waived for certain groups, such as parent-teacher associations, scout troops, and parent/school clubs. Other groups are charged direct costs.

Private Facilities

Public recreational facilities in San Rafael are supplemented by private facilities. Such facilities include the Dominican University Conlan Center with regulation basketball and volleyball courts, a fitness center, and a swimming pool. Marin Academy in the Downtown Precise Plan Area includes a gymnasium, pool, and athletic fields. The Peacock Gap neighborhood has a private golf course. There are additional swim and racquet clubs throughout the EIR Study Area. Larger residential developments in San Rafael may include recreational facilities, such as swimming pools, community rooms, and tennis courts. These facilities are typically supported by Homeowner Associations or membership fees in owner-occupied developments or are passed along to tenants through rent in apartment communities.

Service Standards

Adequacy of a city's park system is most commonly measured by the number of acres of parkland per 1,000 residents. Most cities strive for a standard of 3 to 5 acres of active open space per 1,000 residents. For the purposes of calculating Quimby Act fees as described in the Regulatory Framework above, calculations typically count areas of parkland within a city's Planning Area, provided they are publicly accessible for community and neighborhood recreation. This includes parkland owned by other agencies, as well as school district properties, which are counted at 50 percent of their actual acreage. Based on 306.1 acres of parkland shown in Table 4.15-5, and the EIR Study Area's current population of 75,751 residents, the parkland ratio is 4.04 acres per 1,000 residents.³¹

Per capita standards generally do not count passive open space areas since they serve a different function than active parkland. If such areas were added to the inventory, the existing ratio in the EIR Study Area would be roughly 50 acres of open space per 1,000 residents, which is nearly five times the national average of 10.1 acres per 1,000 residents, according to the NRPA.

³¹ 75,751 existing residents/1,000 = 75.751; 306.1 acres of existing park/75.751 = 4.04 acres of parkland per 1,000 residents

PUBLIC SERVICES AND RECREATION

Planned Improvements

Planned parkland improvements are identified in the City's three-year capital improvement program. The list of needed improvements is informed by staff and community input, and by the results of a 2018 *Facilities Assessment Study*. Facilities such as play structures require periodic replacement due to wear and tear, while community centers require modernization, Americans with Disabilities Act (ADA) compliance upgrades, and repairs due to heavy use.

Recently completed projects include a new prefabricated restroom at Bret Harte Park, the new Albert Park playground, replacement of the Pickleweed Park playground, replacement of the Victor Jones playground, and interior restrooms at the San Rafael Community Center.

Funding

A variety of funding sources are used to cover parkland capital improvement costs. One such source is Measure A, a countywide 0.25-cent sales tax passed in 2012, managed by the County of Marin. Measure A has a nine-year term and is used to care for existing parks and open spaces, restore and protect farmland, and support regional and community parks. About 15 percent of the Measure A revenue stream is directed to local governments in Marin County.

Some of the City's Municipal General Fund is set aside in a Building Maintenance account, which supports parks, community centers, and other City buildings. The City's budget includes a bedroom tax fund, which includes money for neighborhood park maintenance and development, and a park capital projects fund, which is a repository for funds to be used for capital projects. The City may also apply for grants from the State and other entities. Gas tax revenues provided to the City by the State provide a supplemental funding source, although these funds are primarily intended for transportation projects.

Funding also comes from parkland dedication in-lieu fees, as outlined in Section 15.09 of the SRMC. In-lieu fees are paid on a project-by-project basis when a subdivider of residential property submitting a tentative map elects to pay an in-lieu fee instead of dedicating parkland within a proposed project.

The City also reviews more stable and reliable long-term funding sources for capital projects, including bond financing, grant funding, voter-approved taxes, and alternative funding mechanisms. Alternative mechanisms could include public-private partnerships, such as the unique arrangement between the City and Terrapin Crossroads at Beach Park. The park remains in public ownership, although it was leased to a restaurant/entertainment venue at \$15,000 per year for seven years. However, any improvements made to the premises by Terrapin Crossroads in excess of \$15,000 will be credited to the following year's lease payment. To date, Terrapin Crossroads has implemented over \$100,000 in improvements and ongoing programming for community events, as well as activities such as bocce, volleyball, and a children's play area.

4.15.5.3 STANDARDS OF SIGNIFICANCE

Pursuant to Appendix G, Environmental Checklist Form, of the CEQA Guidelines, implementation of the proposed project would have a significant impact to parks and recreation if it would:

PUBLIC SERVICES AND RECREATION

1. Result in substantial adverse physical impacts associated with the provision of new or physically altered parks and recreational facilities, need for new or physically altered parks and recreation facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.
2. Increase the use of existing neighborhood and regional parks or other recreational facilities such that physical deterioration of the facility would occur or be accelerated.
3. Result in significant cumulative impacts with respect to parks and recreation.

4.15.5.4 IMPACT DISCUSSION

PS-9	Implementation of the proposed project could result in the need for new or physically altered park facilities or other recreational facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives.
-------------	--

General Plan 2040

As discussed in Section 4.15.5.2, Existing Conditions, the EIR Study Area currently provides 4.04 acres of parkland per 1,000 residents, which exceeds its adopted standard of providing 3.0 acres of parkland per 1,000 residents.³² However, implementation of the proposed General Plan 2040 could introduce up to 8,910 new residents, which would increase the demand for parks and recreational facilities.

The proposed Parks, Recreation, and Open Space (PROS) Element contains goals, policies, and programs that require local planning and development decisions to consider and mitigate impacts that potential future development could have on available parkland and the quality of facilities. The following goals, policies, and programs would serve to reduce impacts to such parks, recreation, and open space in the EIR Study Area:

Goal PROS-1: Quality Parks for All to Enjoy. Sustain high quality parks that meet the recreational needs of all those who live and work in San Rafael.

- **Policy PROS-1.1: Park Classification.** Maintain a system of community, neighborhood, pocket, and special use parks. These parks should be complemented by larger region-serving parks and open spaces, and by school recreation areas.
 - **Program PROS-1.1A: Parks and Recreation Master Plan.** Prepare a Parks and Recreation Master Plan, including citywide recommendations for park management, operations, facility development, potential acquisition, and recreation service delivery, as well as recommendations for each City-owned park.
 - **Program PROS 1.1B: Capital Improvement Program.** Use the Capital Improvement Program to identify funding sources and timing of parks and recreation capital projects.

³² 75,751 existing residents/1,000 = 75.751; 306.1 acres of existing park/75.751 = 4.04 acres of parkland per 1,000 residents

PUBLIC SERVICES AND RECREATION

- **Policy PROS-1.2: Per Capita Acreage Standard.** Maintain a citywide standard of 4.0 acres of improved park and recreation land per 1,000 residents.
 - **Program PROS-1.2A: Municipal Code Amendment.** Modify Chapter 15.09 of the Municipal Code to establish a general standard of 4.0 acres of improved parkland per 1,000. Adjust the formulas for dedication of land to reflect this standard.
 - **Program PROS-1.2B: Park In Lieu Fees.** Periodically adjust park in-lieu fees to reflect the prevailing costs of land and facilities. Any increases to existing fees should be developed through a public process in which potential cost impacts on development feasibility are disclosed and measures to offset impacts are considered.
- **Policy PROS 1.3: Distribution of Parks.** Strive for a balanced distribution of neighborhood and community parks across the city. When planning new parks, prioritize areas that lack existing parkland or outdoor space, and have higher needs due to higher housing densities and social and economic conditions.
 - **Program PROS-1.3A: New Parks.** Develop additional parks and playgrounds in areas with unmet needs and in areas experiencing growth. Opportunities to create new parks within new development and on underutilized public land should be pursued.
 - **Program PROS-1.3B: Parks on Former School Sites.** Work with San Rafael City Schools and the Miller Creek School District to identify ways to acquire on-site recreational facilities in the event that school properties are closed, leased, or offered for sale.
- **Policy PROS-1.6: Park Improvements.** Regularly upgrade and modernize San Rafael's parks to meet the recreational needs of the community and replace aging or deficient facilities.
 - **Program PROS-1.6A: Needs Assessment.** Conduct a needs assessment as part of a Parks and Recreation Master Plan. Recreational facility needs should be periodically reevaluated in response to trends, demographics, and changing conditions
 - **Program PROS-1.6B Park Improvements.** As part of the Parks and Recreation Master Plan, prepare plans to improve neighborhood and community park facilities. Seek funding to implement these plans.
- **Policy PROS-1.7: Athletic Field Design.** Encourage athletic field design which maximizes versatility, cost-efficiency, and the ability to use fields year-round.
 - **Program PROS-1.7A: Field Improvements.** Evaluate local athletic fields as part of a Parks and Recreation Master Plan. Develop design and capital facility recommendations for athletic fields based on the findings.
- **Policy PROS-1.12: Joint Use.** Encourage formal agreements with the School Districts that allow for the joint development, maintenance and use of school facilities for recreational use when schools are not in session. Agreements should also address access to school parking lots for sporting events and other measures to minimize the impacts of joint use on nearby neighborhoods.
 - **Program PROS-1.12A: Joint Use Agreements.** Work with SRCS and MCSD to formalize joint use agreements for parks, playgrounds, sports fields, and other school facilities.
- **Policy PROS-1.13: Recreational Facilities in Development Projects.** Encourage, and where appropriate require, the construction of on-site recreational facilities in multi-family, mixed use, and office projects to supplement the facilities available in City parks.

PUBLIC SERVICES AND RECREATION

- **Program PROS-1.13A: Onsite Recreation Facilities.** Continue to implement zoning regulations that require appropriate recreational facilities for residents in new development.
- **Policy PROS-1.14: Commercial Recreation.** Encourage private sector development of complementary recreational facilities to serve community needs, such as commercial recreation and athletic field facilities, swim clubs, tennis clubs, marinas, and gyms and health clubs.
 - **Program PROS-1.14A: Commercial Recreation.** Consider amending the zoning ordinance to allow a floor area ratio exemption for on-site recreational facilities open to the public.

Policy PROS-1.2 would increase the current parkland standard to 4.0 acres per 1,000 residents. With the projected addition of 8,910 residents by 2040 without adding any new parks, the City's parkland ratio would be 3.61 acres of parkland per 1,000 residents.³³ To achieve the proposed standard, the City would need to add 37 acres of parkland. Program PROS-1.1A, which, amongst other things, would require the City to look at the potential acquisition of parkland as part of the Park and Recreation Master Plan process, and recreation service delivery, as well as recommendations for each City-owned park. Program PROS-1.3A would require the City to develop additional parks and playgrounds in areas with unmet needs and in areas experiencing growth. Program PROS-1.3B would require the City to work with San Rafael City Schools and the Miller Creek School District to identify ways to acquire on-site recreational facilities in the event that school properties are closed, leased, or offered for sale. Implementation of these programs, combined with the ongoing collection of impact fees, would help to ensure that the proposed new service level is achieved and maintained.

While the City is currently above the existing 3.0 acres per 1,000 acres of parkland standard for parkland adopted in the SRMC but below the proposed standard of 4.0 acres per 1,000 acres of parkland specified by Program PROS-1.2A, the City is anticipated to meet the proposed ratio upon buildout of the proposed General Plan 2040 with the implementation of policies and programs requiring park dedication and fees for new development. SRMC Section 15.09, Park Dedication and In-Lieu Fees, would continue to require residential subdivisions to either provide parkland or pay in-lieu fees for the City to dedicate parkland elsewhere. This would result in the incremental addition of parkland if a residential subdivision is proposed in the city.

As indicated above, new residents from development allowed by the proposed General Plan 2040 would increase the demand for recreational facilities, and recreational facility standards would require the construction of new or expanded recreation facilities. The estimated timing or location of such facilities or the exact nature of these facilities are not known, so project-specific environmental impacts that would occur from their construction and operation cannot be determined at this time. However, depending on the type, size, and location of new parks, the construction of new parks would be subject to environmental review and the mitigating policies and mitigation measures described in this EIR to ensure the impacts from the construction would be less than significant. The construction of project-specific parks would require permitting and review in accordance with City standards, which would ensure that any environmental impacts are disclosed and mitigated to the extent possible. This EIR is a programmatic

³³ (75,751 existing residents + 8,910 new residents = 84,661 residents)/1,000 = 84.661; 306.1 acres of existing park/84.661 = 3.61 acres of parkland per 1,000 residents.

PUBLIC SERVICES AND RECREATION

document and does not evaluate the environmental impacts of future project-specific development. Therefore, the impact is considered *less than significant*.

Significance without Mitigation: Less than significant.

Downtown Precise Plan

The proposed Downtown Precise Plan has no specific policies, and the Downtown Code has no specific regulations related to park and recreation services. Parkland in the Downtown Precise Plan Area is accounted for and calculated in the parkland acreage for the entire EIR Study Area. The Downtown Precise Plan could result in the creation of additional pocket parks or open space that would augment the existing inventory. Therefore, the impacts described for the proposed General Plan 2040 would also apply in the Downtown Precise Plan Area. Accordingly, like the General Plan 2040, impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

PS-10	Implementation of the proposed project could increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated.
--------------	--

General Plan 2040

As described previously, future development allowed by the proposed General Plan would result in increased population in San Rafael with up to 8,910 new residents, which would increase demands for parks and recreational facilities, and could cause physical deterioration of park facilities. However, the proposed General Plan contains goals, policies, and programs that would support parkland goals, and as described in Section 4.15.4.2, the SRMC establishes parkland dedication and/or fee requirements for new development, helping to ensure that individual park and recreation facilities are not overburdened by use.

As discussed in the Section 4.15.5.2, Existing Conditions, the City of San Rafael has many planned improvements in the pipeline for parks, the majority of which are already funded. These include specific projects to replace aging equipment, repaving, restroom repair, updating of ADA resources, among others.

The proposed Parks, Recreation, and Open Space Element contains goals, policies, and programs that require local planning and development decisions to consider and mitigate impacts that potential future development could have on existing parks and the quality of the facilities. Several proposed goals, policies, and programs, as listed in Impact Discussion PS-9, ensure that parks, recreational facilities, and open space are adequately maintained and protect the public's investment in park and recreation facilities. While potential future development under implementation of the proposed General Plan 2040 would result in an increased population with an increased demand for parks and recreational facilities, buildout would occur incrementally throughout the 20-year horizon, and future development would be subject to

PUBLIC SERVICES AND RECREATION

the proposed General Plan 2040 goals, policies, and programs listed in Impact Discussion PS-9; therefore, impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

Downtown Precise Plan

Buildout of the Downtown Precise Plan is expected to result in an increase of approximately 2,200 residential units and 3,570 residents by 2040. Similar to the proposed General Plan 2040, buildout of the proposed Downtown Precise Plan would increase demand on parks and recreational facilities in such a manner that the physical condition of these sites and facilities could be degraded. The proposed Downtown Precise Plan has no specific policies, and the Downtown Code has no specific regulations related to park and recreation services. Therefore, with the implementation of the proposed General Plan 2040 goals, policies, and programs listed in Impact Discussion PS-9, the proposed buildout in Downtown Precise Plan Area would not increase the use of existing neighborhood and regional parks to the degree that substantial deterioration of park facilities would occur. Accordingly, impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

PS-11	Implementation of the proposed project could result in a cumulatively considerable impact to parks.
--------------	--

As discussed in Chapter 4, Environmental Analysis, of this Draft EIR, this EIR cumulative impacts are considered in the context of projected growth in the rest of Marin County and the surrounding region, as forecast by *Plan Bay Area 2040*, and contiguous with the service area boundaries of the service providers evaluated in this section, including park and recreation areas provided by the City, the County of Marin's Open Space District and the California Department of Parks and Recreation.

As described under Impact Discussions PS-9 and PS-10, the potential population increase under the proposed project would increase demand for park and recreational facilities. Compliance with the SRMC, proposed General Plan 2040 goals, policies, and programs listed in Impact Discussions PS-9 and PS-10, would ensure that adequate parklands and recreational facilities are provided, maintained, and funded through in-lieu fees, maintenance fees, or parkland dedication in the EIR Study Area. This would mitigate potential impacts that future development would have on park and recreation services in the EIR Study Area. Therefore, the proposed project would not result in a cumulatively considerable impact to park and recreational facilities and cumulative impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

PUBLIC SERVICES AND RECREATION

This page intentionally left blank.