

16 Public Services & Recreation

16.1 Introduction

This chapter describes the existing setting of the proposed project site as it relates to public services and recreation; identifies associated regulatory conditions and requirements; presents the criteria used to evaluate potential impacts on fire protection, police protection, schools, parks and recreation, and libraries; and identifies mitigation measures to reduce or avoid each significant impact. The significance of each impact after the incorporation of identified mitigation measures is included at the end of this chapter.

Information used to prepare this chapter came from the following sources:

- City of Brentwood General Plan Update (General Plan), 2014
- City of Brentwood General Plan EIR (General Plan EIR), Draft Program Environmental Impact Report for the 2014 Brentwood General Plan Update, 2014
- City of Brentwood Parks, Trails, and Recreation Master Plan, 2002
- Urban Water Management Plan for the City of Brentwood, 2015
- Deployment Performance and Headquarters Staffing Adequacy Study for East Contra Costa Fire Protection District, 2016
- Development Impact Fee Report Fiscal Year Ended for the City of Brentwood, 2016
- The Brentwood Police Department and East Contra Costa Fire Protection District (contacted regarding current average response times, estimated response times, and current service levels)
- Brentwood Union School District and Liberty Union High School District (contacted regarding current enrollment capacities, number of permanent and portable classrooms, and status of State funding eligibility)

16.2 Scoping Issues Addressed

During the public comment scoping period for the proposed project, the following issues were raised regarding public services and recreation and are addressed in this section:

- Concern regarding already limited emergency services
- Concern regarding fire and emergency medical service response times and staffing capacity due to the existing three-station district model
- Concern regarding police service response times and staffing capacity
- Concern regarding effects of senior/assisted living housing facilities on schools

- Concern regarding the impact of open space that has deteriorated as a result of little maintenance on the golf course
- Concerns regarding what it will take to get the golf course back in working order
- Concern regarding how open space will be managed
- Concern regarding how the EIR will analyze open space
- Concern regarding the potential increased fire risk to neighboring properties due to an increase demand on the three-station fire department
- Many students use the trails along the golf courses to get to and from school, which could be impacted negatively if the trails were removed for development
- Two schools now share Deer Ridge for their competitive golf team schedule; prior to the golf course closure, these teams were able to practice at both Deer Ridge and Shadow Lakes
- Shadow Lakes has been used in the past as a staging area for emergency services for Heritage High
- Concerns regarding students living with extended families in the adult-only communities. These students can have additional educational needs

16.3 Environmental Setting

This section presents information on public services and recreation serving the project site including the Deer Ridge site (Village One) and the Shadow Lakes site (Village Two).

16.3.1 Public Services

Police Protection

The Brentwood Police Department provides law enforcement and police protection services throughout the city, an approximately 14-square-mile service area (City of Brentwood, 2014). Established in 1948, the Brentwood Police Department is a full-service law enforcement agency that is charged with the enforcement of local, State, and Federal laws, and with providing 24-hour protection of the lives and property of the public. The Brentwood Police Department is divided in four separate, geographic beats, with headquarters located approximately 2.6 miles east of the project site at 9100 Brentwood Boulevard. The Brentwood Police Department functions both as an instrument of public service and as a tool for the distribution of information, guidance, and direction (City of Brentwood General Plan, 2014). There are currently no future plans for a secondary facility or station (Brentwood Police Department, 2017).

The Brentwood Police Department currently has 66 sworn police officers and 30 civilian support staff. In addition to the permanent staff, the department has approximately 20 volunteers who are citizens of the community and assist with day to day operations (City of Brentwood, 2017a).

The Brentwood Police Department provides an annual Performance Report to the City Council, which identifies the average response time for priority calls for service. Currently, the Brentwood Police Department's average response time for Priority 1 (Emergency) calls is 4 minutes 53 seconds and for Priority 2 (Priority Response) calls is 5 minutes 38 seconds (Brentwood Police Department, 2017).

Fire Protection

The East Contra Costa Fire Protection District (ECCFPD) includes the second largest fire service area in Contra Costa County, providing fire protection services to the City of Brentwood and surrounding communities. In addition to the fire suppression and fire prevention services, ECCFPD personnel also provide basic life support services including first aid, APR, administration of oxygen, maintenance of airway spina immobilization splinting of fractures, control of external hemorrhage, emergency childbirth, administration of epinephrine and Norco (for certain drug overdose). In addition, ECCFPD coordinate closely with AMR and a medical helicopter operator for ambulance transportation for patients.

The ECCFPD provides these fire suppression and emergency services for an approximately 250-square-mile area that includes the City of Brentwood, City of Oakley, and the communities of Bethel Island, Byron, Discovery Bay, Knightsen, and Marsh Creek/Morgan Territory. The ECCFPD was formed in 2002 by the Contra Costa County Board of Supervisors and the Contra Costa Local Agency Formation Commission (LAFCO) as a consolidation of the Oakley, Bethel Island, and Brentwood fire districts (City of Brentwood, 2014). The ECCFPD consists of the following three divisions¹:

- **Operations Division.** The Fire Suppression (Operations Division) is the largest Division within the ECCFPD. It is responsible for emergency medical services (EMS), fire suppression, rescue, hazardous conditions, and all other emergency and non-emergency calls for service.
- **Training Division.** The Training Division is responsible for the delivery of training programs for the professional development of ECCFPD employees. The Training Division's programs include professional development, automatic and mutual aid training, communications management, and occupational safety.
- **Public Education Division.** The Public Education Division of the ECCFPD is responsible for providing the public with information and resources to prevent not only fires, but also to reduce or prevent injuries and death from causes unrelated to fire. Each year the ECCFPD firefighters are dispatched to more emergency medical service calls for unintentional injuries than for actual fire-related emergencies.

¹ Information listed for the Operations, Training, and Public Education divisions was obtained from the City of Brentwood General Plan EIR.

As of July 2017, the ECCFPD operates three fire stations staffed by 30 operational and 3 administrative personnel, which includes a total district staffing of 9 firefighters per day (3 firefighters per station per day). The ECCFPD responds to over 6,900 calls a year that depend on approximately 9,000 fire engine responses (ECCFPD, 2017). The proposed project site is located within the ECCFPD's Brentwood West service area.

The City is served primarily by Fire Station 52, located at 201 John Muir Parkway in the City of Brentwood, Fire Station 53, located in the City of Oakley at 530 O'Hara Ave, and Fire Station 59, located in the City of Discovery Bay at 1685 Bixler Road. Fire Station 52 is the closest fire station to the proposed project site and is located approximately 0.2 mile east of Village Two (Shadow Lakes). Fire Station 53 is located approximately 5 miles northeast of the project site and Fire Station 59 is located approximately 6 miles east of the project site. At this time, ECCFPD has no plans for expansion of facilities or personnel.

For September 2017, the average response time for the ECCFPD was 10:03 minutes. For Brentwood West, the average response time was more than 7 minutes. The National Fire Protection Association Standard 1710, the industry best practice, recommends a 4- to 6-minute response time (ECCFPD, 2017). In response to declining revenues, ECCFPD has made reductions to its staff. Four stations that previously were open and staffed to serve the district have been permanently closed. According to ECCFPD, underfunding and understaffing already impacts its ability to provide service and response times that meet generally accepted standards.

Schools

The City of Brentwood is served by the Brentwood Union School District (BUSD) (elementary schools serving grades K-5 and middle schools serving grades 6-8) and the Liberty Union High School District (LUHSD) (high schools serving grades 9-12). The BUSD operates eight K-5 elementary schools and three middle schools, while the LUHSD operates four high schools.

R. Paul Krey Elementary School and Bright Star Christian Child Care Center are located in the vicinity of the project area, and are less than 0.2 mile north of Village One (Deer Ridge). Heritage High School is the closest high school to the project site and is located approximately 0.25 mile southwest of Village Two. Adams Middle School is outside of the project area, located approximately 0.25 miles southwest of Proposed Village Two.

Libraries

The Brentwood Library is the only public library located in the City of Brentwood and is part of the Contra Costa County Library system. This allows the Brentwood Library to access all libraries within the Contra Costa Library system in order to obtain information not found in the Brentwood Library (City of Brentwood, 2014). The Brentwood Library is currently located at 3535 Oak Street, approximately 2.4 miles east of the project area. The library is open from 9 a.m. to 5 p.m. Monday and Wednesday through Friday, and from 12 p.m. to 8 p.m. on Tuesday. It should be noted that relocation of the Brentwood Library is currently underway. The new library will be located on the former 104/118/120 Oak Street space (City of Brentwood, 2017b).

16.3.2 Parks and Recreation

The City of Brentwood has approximately 234 acres of developed parkland consisting of 70 parks and facilities, 19.2 miles of multi-use trails, and 60 miles of bikes lanes, all maintained by the Parks and Recreation Department (City of Brentwood, 2017c). According to the City of Brentwood General Plan EIR, the City of Brentwood owns approximately 251 acres of parkland, but of that total acreage, approximately 44 acres are for future parkland and are not currently developed. The Parks and Recreation Department offers over 100 recreational activities and events for people of all ages and interests.

The City of Brentwood General Plan EIR categorizes parks into five different types²: Community Parks, Neighborhood Parks, Sports Parks, Special Use Parks, and Greenways.

Community parks

Community parks are generally 15 to 25 acres in size, and include areas for active sports as well as space for family and group activities, such as picnicking. Community parks are larger in size than neighborhood parks and serve to fulfill the active and passive recreational needs of multiple neighborhoods. Community parks serve the needs of local neighborhoods by providing a close to home site for more active recreation that is not typically suitable or physically possible in a neighborhood park (i.e., formal sports fields and courts with night lighting). Community parks and sports parks are where most organized activities are provided by the Parks and Recreation Department. These parks also support various league sports.

Neighborhood parks

Neighborhood parks serve as the focal point of neighborhood communities, the hub for both physical and social activities in a recreational setting that should be primarily passive. Appropriately designed neighborhood parks act as “pulse points” within the city. They are spaces that develop a sense of place while at the same time evolve to reflect the neighborhood they represent. Neighborhood parks act as critical building blocks of the City’s image and assist in developing an overall sense of community and security. They also serve as critical nodes and access points in the citywide green space network. Neighborhood parks are generally 5 to 7 acres. Amenities at neighborhood parks may include ball fields, basketball, volleyball, bocce ball, and tennis courts, small picnic areas, playground equipment, restroom facilities, water play features, and barbeques.

Sports parks

Sports parks are the largest of the park types in the citywide green space network. They are intended to consolidate high use, heavily programmed sport fields, multi-use courts and large scale facilities (such as gymnasiums or aquatic centers). As such, there are typically fewer sports parks than other types of parks within a citywide green space network; however, they are

² Information listed for Community Parks, Neighborhood Parks, Sports Parks, Special Use Parks, and Greenways was obtained from the City of Brentwood General Plan EIR.

strategically located to ensure that they serve the greatest service radius possible. Sports parks are oriented to teen and adult league sports. Sports park sites are generally 40 to 140 acres in size, with an average of 70 acres.

Special use parks

The “Special Use Parks” classification was developed by the City of Brentwood to allow for flexibility in providing recreational resources throughout the citywide green space network. This classification is intended to accommodate special circumstances and unique site characteristics in park, trail, and recreation resources. These types of resources add diversity to the citywide green space network and accommodate a variety of “non-traditional” recreation amenities beyond the standard neighborhood, community, and sports park classifications. At the City’s discretion, this classification may also include the neighborhood, community, or sports park configurations, which have been modified from the original standards, but have the same contiguous shape, size, and design elements, as well as mixed-use parks and greenways.

Greenways

Greenways are comprised of linear parks, trails, and open space. They characteristically reinforce the quality and access of the existing park resources in the neighborhood, sports, and community park categories. Greenways support continuous and safe non-motorized transportation (i.e., biking, walking, running, and/or equestrian riding as appropriate). They can also include staging areas and the potential for pocket parks where appropriate to create an outdoor space for temporary food kiosks, farmers’ markets, or parades.

Nearest Parks and Recreation Facilities to Project site

There are five neighborhood parks located within the project area. The closest park to the proposed project site is Lake Park, which is located less than 30 feet to the east of Village Two, at 401 Lakeview Drive. The next closest park to the project site is Oak Meadow Park, located approximately 0.2 mile north of Village One, at 180 Crawford Drive. Both parks are classified as neighborhood parks and provide basic recreation amenities for nearby residents within their respective neighborhoods. Balfour-Guthrie Park, Cortona Park, and Berkshire Park are located 0.25 mile west, 0.27 mile east, and 0.60 northeast of Village Two, respectively; these same parks are located 1.02 miles northwest, 0.69 mile north, and 1.22 miles north of Village One, respectively. They are all classified as neighborhood parks.

Black Gold Park is located 0.78 mile north of Village One, at 2671 St. Regis Avenue. It is a 6.22-acre neighborhood park.

16.4 Applicable Regulations, Plans, and Standards

16.4.1 Federal

There are no applicable Federal regulations pertaining to public services and recreation.

16.4.2 State

Police Services

All law enforcement agencies within California are organized and operate in accordance with the applicable provisions of the California Penal Code. This code sets forth the authority, rules of conduct, and training for police officers.

Fire Protection

California Occupational Safety and Health Administration

In accordance with California Code of Regulations Title 8 Sections 1270 "Fire Prevention" and 6773 "Fire Protection and Fire Equipment" the California Occupational Safety and Health Administration (Cal/OSHA) has established minimum standards for fire suppression and emergency medical services. The standards include, but are not limited to, guidelines on the handling of highly combustible materials, fire hose sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance, and use of all fire-fighting and emergency medical equipment.

Emergency Response/Evacuation Plans

The State passed legislation authorizing the Office of Emergency Services (OES) to prepare a Standard Emergency Management System (SEMS) program, which sets forth measures by which a jurisdiction should handle emergency disasters. Non-compliance with SEMS could result in the State withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster.

Fire Protection

The California Fire Code contains regulations relating to construction and maintenance of buildings and the use of premises. Topics addressed in the Code include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions to protect and assist first responders, industrial processes, and many other general and specialized fire safety requirements for new and existing buildings and premises.

The International Fire Code (IFC) with the State of California Amendments contains regulations relating to construction, maintenance, and use of buildings. Topics addressed in the IFC include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings and the surrounding premises. The IFC contains specialized technical regulations related to fire and life safety.

International/California Building Code

On January 1, 2017, the State of California adopted the 2016 California Building Code, which affects the design and construction of new and existing buildings. The 2016 California Building Code is based on the 2015 International Building Code. Various California agencies add their own amendments to the 2015 International Building Code.

California Health and Safety Code

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

Brentwood Emergency Operations Plan

The purpose of the Brentwood Emergency Operations Plan (EOP) is to provide a blueprint for emergency management within the City. The goal of the plan is to reduce the loss of lives and property in the event of a disaster. The EOP identifies the City's emergency planning, organization, and response policies and procedures. The EOP also addresses the integration and coordination within other governmental agencies that are required during an emergency.

The City's response to disasters is based on five phases:

1. Preparedness;
2. Increased readiness;
3. Initial response operations;
4. Extended response operations; and
5. Recovery operations.

During each phase, specific actions are taken to reduce and/or eliminate the threat of specific disaster situations. In coordination with the City Manager and Incident Commanders, the Emergency Services Coordinator determines the phase and initiates the appropriate level of alert for response agencies, including the activation of the Emergency Operations Center as required.

Multi-Jurisdictional Local Government Hazard Mitigation Plan for The San Francisco Bay Area

The Association of Bay Area Governments (ABAG) prepared and adopted a Local Hazards Mitigation Plan in 2005. The purpose of the Plan is to serve as a catalyst for a dialogue on public policies needed to mitigate the natural hazards that affect the San Francisco Bay Area. The overall strategy of the Plan is to utilize a multi-jurisdictional effort to maintain and enhance the disaster resistance of the region, and to fulfill the requirements of the Disaster Mitigation Act of 2000 for all local governments to develop and adopt this type of plan.

Schools

Senate Bill 50

Senate Bill (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 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.

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

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 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. On January 22, 2014, the State Allocation Board (SAB) approved increasing the allowable amount of statutory school facilities fees (Level I School Fees) from \$3.20 to \$3.36 per square foot of assessable space for residential development of 500 square feet or more, and from \$0.51 to \$0.54 per square foot of chargeable covered and enclosed space for commercial/industrial development (State Allocation Board, 2014). School districts may levy high fees if they apply to the SAB and meet certain conditions.

California Department of Education

The California Department of Education (CDE) School Facilities Planning Division (SFPD) prepared a School Site Selection and Approval Guide that provides criteria for locating appropriate school sites in California. School site and size recommendations were changed by the CDE in 2000 to reflect various changes in educational conditions, such as lowering of class sizes and use of advanced technology. The expanded use of school buildings and grounds for community and agency joint use and concern for the safety of the students and staff members also influenced the modification of the CDE recommendations.

The Kindergarten-University Public Education Facilities Bond Act of 2002 (Proposition 47)

This act was approved by California voters in November 2002 and provides for a bond issue of \$13.05 billion to fund necessary education facilities to relieve overcrowding and to repair older schools. Funds will be targeted at areas of greatest need and must be spent according to strict accountability measures. Funds will also be used to upgrade and build new classrooms in the California Community Colleges, the California State University, and the University of California in order to provide adequate higher education facilities to accommodate growing student enrollment.

Parks and Recreation

Quimby Act

The Quimby Act (California Government Code Section 66477) states that “the legislative body of a City or county may, by ordinance, require the dedication of land or impose a requirement of the payment of fees in lieu thereof, or a combination of both, for park or recreational purposes as a condition to the approval of a tentative or parcel map.” Requirements of the Quimby Act apply only to the acquisition of new parkland and do not apply to the physical development of new park facilities or associated operations and maintenance costs. The Quimby Act seeks to preserve open space needed to develop parkland and recreational facilities; however, the actual development of parks and other recreational facilities is subject to discretionary approval and is evaluated on a case-by-case basis with new residential development. The City of Brentwood has adopted park fees as allowed by the Quimby Act, as described in greater detail below.

16.4.3 Local

Brentwood Development Fee Program

The City of Brentwood Development Fee Program contains the City’s capital improvement facilities fee program to pay for the required infrastructure identified in the City’s General Plan. Infrastructure, including parks and recreation facilities, is developed in two major ways. New development builds it as each project is developed, or the City builds it as part of the Capital Improvement Program (CIP). The Development Fee Program evaluates planned capital improvements and associated budget cost estimates, and assigns eligible costs as fees based upon the relative demand imposed by the various types of new development. In addition, a separate Parks and Trails Facility Fee provides for the acquisition and development of parks as specified in the City’s Parks, Trails, and Recreation Master Plan and Development Fee Program. Parks and trails fees are collected from all new residential development projects in the city, and are assessed on a per-unit basis (City of Brentwood, 2016).

The City’s Development Fee Program does not include fees imposed by outside agencies such as the Brentwood Union School District and the Liberty Union High School District, the East Contra Costa Regional Fee and Financing Authority, and the Contra Costa County Flood Control and Water Conservation District. As part of the Development Fee Program, the following funds have been established to account for the impact of new development on the following types of public facilities³: Water, Roadway, Parks and Trails, Wastewater, Community Facility, and Fire.

The City’s Fire Facility Fee Fund serves to provide necessary funding for fire facilities required to serve new development in the city of Brentwood through buildout as defined by the General Plan (City of Brentwood, 2016).

³ For the purposes of this analysis, only the Parks and Trails and Fire fees are analyzed in this section.

The Brentwood Police Department currently has no development fees for law enforcement services; however, the City of Brentwood is exploring the use of development fees to enhance existing video surveillance projects, such as License Plate Readers (Brentwood Police Department, 2017). Historically, facilities for law enforcement have been covered under the Community Facilities Fee Fund. The City's Development Impact Fee Program does not fund law enforcement services, but the Community Facilities District special tax would cover license plate readers (Galey, 2017).

The City of Brentwood Parks, Trails, and Recreation Master Plan

The City of Brentwood Parks, Trails, and Recreation Master Plan was adopted in 2002 by the City Council. The purpose of the plan is to establish goals, policies, and objectives under which the city's parks, trails, and recreation facilities will be developed and managed. This plan is the guiding document for decisions regarding the provisions of parks, trails, open space, and recreation facilities and programming in the City of Brentwood. The plan identifies guidelines for park development and existing parks, trails, and recreation. The Master Plan is currently being updated by the Parks and Recreation Department. No tentative date for its release has been announced yet.

City of Brentwood General Plan

Project relevant General Plan policies for public services and recreation are addressed in this section. Where inconsistencies exist, if any, they are addressed in the respective impact analysis below.

Community Services and Facilities Goal 2: Maintain a diverse and comprehensive system of high quality parks, trails, recreation facilities, and recreational programs and services that meets the needs of all segments of the community.

- **Policy CSF 2-1:** Ensure the provision of sufficient land that is well distributed and interconnected throughout the community for parks, trails, and recreation facilities.
- **Policy CSF 2-2:** Achieve and maintain a minimum overall citywide ratio of 5 acres of park land per 1,000 residents.
- **Policy CSF 2-3:** Park acreage should be provided in accordance with the following standards:
 - Neighborhood Park - 3.0 acres per 1,000 residents; and
 - Community Park - 2.0 acres per 1,000 residents.
- **Policy CSF 2-4:** Develop new parks, trails, and recreation facilities through developer fees in areas which are accessible and convenient to the community, prioritizing areas that are lacking these facilities.

- Policy CSF 2-6: Uphold design, construction, implementation, and maintenance standards to ensure high quality parks, trails, and recreation facilities, programs, and services, now and into the future.
- Policy CSF 2-7: Expand, renovate, and maintain high quality parks, trails, and recreation facilities, programs, and services to accommodate existing and future needs that address traditional and non-traditional recreation, active and passive recreation, wellness, historical, cultural arts, environmental education, conservation, accessibility, inclusion, diversity, safety, and new technology.
- Policy CSF 2-8: Consider the effects of new development on parks, trails, and recreation facilities, programs, and services, and condition new development appropriately to ensure that the City maintains an adequate inventory and network of facilities and resources.
- Policy CSF 2-9: Continue to collect development impact fees in order to fund the acquisition of parkland, construction of new facilities and resources, and maintenance of City parks, trails, and recreation facilities. The City shall ensure that park facility impact fees are collected for new development that increases demand for parks, trails, and recreation facilities.
- Policy CSF 2-11: Encourage the provision and dedication of parkland within future development projects in order to ensure that the City maintains an extensive network of neighborhood parks that serve all areas of the community.
- Policy CSF 2-12: Through conditions of approval and/or development agreements, ensure that the development of new parks, trails, and recreation facilities occurs during the infrastructure construction phase of new development projects so that they are open and available to the public prior to completion of the project.
- Policy CSF 2-17: Encourage and maintain diverse public access to parks, trails, and recreation facilities to the greatest extent feasible.

Community Services and Facilities Goal 3: Maintain a safe community through the provision of high quality police services and crime prevention measures.

- Policy CSF 3-1: Ensure that the Police Department has adequate funding, staff, and equipment to accommodate existing and future growth in Brentwood.
- Policy CSF 3-2: The City shall strive to maintain a police force level of 1.5 to 2.5 officers per 1,000 population.
- Policy CSF 3-3: Promote and support community-based crime prevention programs, as an important augmentation to the provision of professional police services.
- Policy CSF 3-4: Emphasize the use of physical site planning as an effective means of preventing crime. Open spaces, landscaping, parking lots, parks, play areas, and other

public spaces should be designed with maximum feasible visual and aural exposure to community residents.

- Policy CSF 3-5: Promote coordination between land use planning and urban design through consultation and coordination with the Police Department during the review of new development applications.

Actions in support of Community Services and Facilities Goal 3 include the following:

- Action CSF 3a: Continue to require preparation of an annual Police Department Performance Report, as amended periodically.
- Action CSF 3b: In conjunction with the annual Police Department Performance Report, further develop and refine best practices to assess, monitor, and maintain the Police Department's organizational performance goals and monitor police staffing levels. The assessment categories related to adequate police staffing could include but are not limited to: Crime rates; Response times; Clearance rates; Population; Police department workload; Financial resources; and Performance standards.
- Action CSF 3c: As part of the development review process, consult with the Police Department in order to ensure that the project design facilitates adequate police staffing and that the project addresses its impacts on police services.

Community Services and Facilities Goal 4: Ensure the provision of high quality and responsive fire protection services.

- Policy CSF 4-1: Encourage and support the East Contra Costa Fire Protection District and providers of emergency medical services to maintain adequate staff and equipment to provide high quality and responsive fire protection and emergency medical services to existing and future growth in Brentwood.
- Policy CSF 4-2: Encourage, and work cooperatively with, the East Contra Costa Fire Protection District and providers of emergency medical services to maintain a three to five-minute response time for all emergency response calls within Brentwood.
- Policy CSF 4-4: Design and maintain roadways in such a way so as to maintain acceptable emergency vehicle response times.
- Policy CSF 4-5: Ensure that new development is designed, constructed, and equipped consistent with the requirements of the California Fire Code in order to minimize the risk of fire.
- Policy CSF 4-6: Ensure that new development is served with adequate water volumes and water pressure for fire protection.

Community Services and Facilities Goal 5: Enhance the quality of life for all City residents through the provision of cultural and social resources including quality schools, libraries, medical, and other community services and facilities.

- Policy CSF 5-4: Support the provision of high quality civic, library, medical, and other community facilities in order to meet the broad range of needs within Brentwood.
- Policy CSF 5-7: Pursue additional funding sources for library operations that serve Brentwood.
- Policy CSF 5-9: Work with health care providers to provide a range of health-related facilities in Brentwood to meet the needs of the growing population.
- Policy CSF 5-11: Provide responsive and high quality City government services to residents and businesses.
- Policy CSF 5-16: Encourage and support the provision of residential care facilities in accordance with State law to meet the needs of existing and future residents.
- Policy CSF 5-17: Consider the needs of seniors and people with disabilities when reviewing future development applications and land use plans.
- Policy CSF 5-18: Encourage services and programs that meet the unique needs of seniors within Brentwood, including the establishment of medical facilities, transportation options for seniors and people with mobility disabilities, senior centers, and programs that provide for in-home care and aging-in-place.

Conservation and Open Space Goal 1: Ensure the provision and preservation of diverse and accessible open spaces throughout the Brentwood Planning Area.

- Policy COS 1-5: Recognize urban open space as essential to maintaining a high quality of life within the City limits of Brentwood.
- Policy COS 1-7: Encourage public and private efforts to preserve open space.
- Policy COS 1-9: Encourage the protection and incorporation of existing, native, mature, non-orchard trees and areas of natural vegetation as part of new development.

Economic Development Goal 5: Recognize the importance of local creeks, waterways, and recreational opportunities in providing a desirable environment for businesses and providing tourism and recreation opportunities.

- Policy ED 5-1: Ensure that public, residential, and non-residential developments locating along local creeks, waterways, and open space are designed to include these natural features as an attraction and amenity, while also providing for their conservation where appropriate.

City of Brentwood Municipal Code

The City of Brentwood Municipal Code contains all ordinances for the City. The Municipal Code is organized by Title, Chapter, and Section.

The City's Fire Code, which is Section 15.06.020, regulates permit processes, emergency access, hazardous material handling, and fire protection systems, including automatic sprinkler services,

fire extinguishers, and fire alarms. The Fire Code contains specialized technical regulations related to fire and life safety in the City.

16.5 Environmental Impacts and Mitigation Measures

16.5.1 Significance Criteria

The following significance criteria for public services and recreation were derived from the Environmental Checklist in the State CEQA Guidelines Appendix G. An impact would be considered significant and would require mitigation if it would meet one of the following criteria.

- Result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response time, or other performance objectives for any of the following public services:
 - Fire protection;
 - Police protection;
 - Schools;
 - Parks and Recreation facilities; or
 - Libraries.
- Would the project 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?
- Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

16.5.2 Impacts of the Proposed Project

Impact PSR-1: Would the project result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response time, or other performance objectives for any of the following public services.

The proposed project would result in the construction of up to 560 age-restricted housing units. A portion of the Deer Ridge site, including the existing clubhouse and parking area, as well as a portion of the existing golf course, would be developed into an approximately 13.77-acre age-restricted housing community (Village One). A portion of the Shadow Lakes site, including holes 10 and 18 of the existing golf course, would be developed into an approximately 18.26-acre age-restricted housing community (Village Two). Village One may accommodate up to 250 age-restricted units in multiple buildings and Village Two may accommodate up to 310 age-restricted units in multiple buildings.

Physical impacts to public services are usually associated with population growth in an area, which increase the demand for a particular service, leading to the need for expanded or new facilities. Based on the *Water Supply Assessment* prepared by Coleman Engineering (see Appendix I), 1.5 people per unit has been used as an average household size for senior projects in the City of Brentwood (Coleman, 2017). Therefore, construction of 560 age-restricted units would result in approximately 840 new residents. This number assumes all residents associated with the proposed project would be “new” and would not relocate from their existing homes within Brentwood.

As indicated in the population and housing discussion in Chapter 15, the City of Brentwood General Plan projects a buildout of 9,972 additional residential units within the city limits and a corresponding projected population of 80,917 by 2035. Currently, the City of Brentwood has a population of approximately 61,055 as of January 2017, which represents approximately five percent of Contra Costa County’s total population (Department of Finance [DOF], 2017). Thus, the buildout of the City of Brentwood General Plan would increase the population by approximately 33 percent.

The proposed project is anticipated to increase the population within the project site by approximately 840 residents. This is an approximately 1.4 percent increase in the City’s total population as of January 2017, well within the projected total increase of approximately 51 percent, resulting in a total population of approximately 92,336 people by 2040. However, the current General Plan does not include any population increase for the project area.

Fire Protection Services

As mentioned above, the ECCFPD has three fire stations staffed by 30 operational and three administrative personnel, which includes a total district staffing of 9 firefighters per day (3 per station per day) to serve the ECCFPD service area’s residents and businesses (ECCFPD, 2017). The closest fire station to Village One and Village Two is Fire Station 52, located at 201 John Muir Parkway. This station is approximately 0.20 mile east of Village Two and approximately 0.65 mile north of Village One. The main route of travel for emergency vehicles from Fire Station 52 to the proposed project site would be from Balfour Road, East Country Club Drive, and Foothill Drive.

Impact PSR-1a. Increased fire protection due to construction-related activities.

The proposed project would construct up to 560 age-restricted housing units and would combine the two existing golf courses to provide for an 18-hole golf course and open space amenities. During the construction phases, heavy equipment and passenger vehicles driving on vegetated areas before clearing and grading could increase the danger of fire. Temporary electrical power lines, the storage and use of combustible materials, and heated mufflers could ignite surrounding vegetation and increase fire risk. Impacts to fire protection services during construction could be potentially significant. To reduce potential impacts on fire protection services, Mitigation Measures PSR-1 and PSR-2 shall be implemented.

Mitigation Measures

MM PSR-1: Prior to the issuance of grading or building permits, the applicant shall develop and implement a Fire Safety Plan for use during construction.

The applicant shall submit the Fire Safety Plan, along with maps of the project site and access roads, to the city, the East Contra Costa Fire Protection District, and the Contra Costa County Fire Protection District for review and approval prior to the issuance of any building permit or grading permits. The Fire Safety Plan shall contain notification procedures and emergency fire precautions including, but not limited to, the following:

- a. All internal combustion engines, stationary and mobile, shall be equipped with spark arresters. Spark arresters shall be in good working order.
- b. Light trucks and cars with factory-installed (type) mufflers shall be used only on roads where the roadway is cleared of vegetation. Said vehicle types shall maintain their factory-installed (type) muffler in good condition.
- c. Fire rules shall be posted on the project bulletin board at the contractor's field office and areas visible to employees.
- d. Equipment parking areas and small stationary engine sites shall be cleared of all extraneous flammable materials.
- e. Personnel shall be trained in the practices of the Fire Safety Plan relevant to their duties. Construction personnel shall be trained and equipped to extinguish small fires in order to prevent them from growing into more serious threats.
- f. The project proponent shall make an effort to restrict use of chainsaws, chippers, vegetation masticators, grinders, drill rigs, tractors, torches, and explosives to outside of the official fire season. When the above tools are used, water tanks equipped with hoses, fire rakes, and axes shall be easily accessible to personnel.
- g. Smoking shall be prohibited in wildland areas and shall be limited to paved areas or areas cleared of all vegetation.
- h. The project proponent shall confer with the ECCFPD regarding the need to install water or dip tanks within the project site. Should dip tanks be required, the project proponent shall construct dip tanks as specified by the ECCFPD.
- i. Perimeter fuel modification zones around building pads shall be implemented and approved by the ECCFPD prior to combustible materials

being brought to the project site areas adjacent to conservation areas that include flammable vegetation.

- j. Existing flammable vegetation shall be removed on vacant lots prior to commencement of construction and prior to bringing combustible construction materials on-site.
- k. Dead fuel, ladder fuel (fuel which can spread fire from ground to trees), and downed fuel shall be removed and trees/shrubs shall be properly limbed, pruned, and spaced per this plan.

MM PSR-2: The applicant shall continuously comply with the Fire Safety Plan during construction of the proposed project.

The applicant shall continuously comply with the Fire Safety Plan and conduct the following tasks during the construction of the project: When a Red Flag Warning is issued by the National Weather Service for the project site, all non-emergency construction activities shall cease. This provision shall be clearly stated in the required Fire Safety Plan. The required Emergency Response Liaison shall ensure implementation of a system that allows for immediate receipt of Red Flag Warning information from the San Francisco/Monterey office of the National Weather Service.

Implementation of MM PSR-1 and MM PSR-2 would reduce construction related impacts on fire protection services to a less than-significant-level.

Impact PSR-1b. Increase in medical emergency services from senior housing facilities.

Senior housing facilities, on average, have a higher rate of use of medical emergency services, which are provided by the ECCFPD. This would potentially increase the need for emergency medical services and facilities. The City of Brentwood has existing funding from development fees programmed for the construction of a new fire station on Shady Willow Lane; however, this fire station would require staffing and equipment. In addition, a specific timeframe for construction of the new station has not been identified, nor programmed. As noted under existing conditions, average response times by ECCFPD in Brentwood are in excess of the standards for industry best practices⁴. Response time is influenced by several factors, including fire station location, available equipment/vehicles and staffing. The anticipated increase in medical emergency service calls, in the absence of the additional facilities and personnel would result in a potentially significant impact.

⁴ For specific information regarding emergency response times related to the addition of project traffic, see Chapter 17, Transportation and Circulation.

As a standard condition of project approval, the applicant is required to pay the City's development impact fee pursuant to the Schedule of City Fees in effect at the time of project approval. The development impact fees are intended to finance public facilities necessary to mitigate the impacts generated by new development in the city of Brentwood and to ensure that new development pays its fair share of associated with the costs of mitigating its impact. This fee includes a Fire Fee to fund fire facilities and apparatus necessary for the safety of new development. While payment of this fee is intended to serve as full mitigation for impacts related to fire service (including response to medical emergencies), the level of funding and timing for implementation of said improvements had not been determined. As such, impacts would be significant and unavoidable until such time as the new station is constructed and/or sufficient facilities and equipment are identified, available and implemented resulting in the ECCFPD's ability to meet standards for industry best practices.

Impact PSR-1c. Ladder truck required for three-story structures.

The residential units would be up to three stories in height (approximately 36 feet). The ECCFPD does not own a ladder truck and relies on other fire departments in the area when a ladder truck is required for structures three-stories or higher. Therefore, the proposed project could result in additional ladder truck needs resulting from the height of the age-restricted housing communities. This is considered a potentially significant impact. As noted above under Impact PSR-1b, the purpose of City's development impact fees, inclusive of the Fire Fee is to fund fire facilities and apparatus for the safety of new development. Although the applicant is required to pay this fee as a standard condition of project approval, and payment of the fee would contribute to the overall total cost of obtaining a ladder truck, until such time as the ladder truck is purchased, this impact would remain significant and unavoidable.

Impact PSR-1d. Increased wildfire risk from additional open space.

The proposed project continues to include a golf course, it would increase the amount of open space. Open space is often less irrigated than golf courses, resulting in a higher change of fire service needs than on a well irrigated golf course. Wildfire risk could increase as a result of the proposed project, due to the nature of open space management and the proximity of the project to areas categorized by CAL FIRE as a "Moderate" Fire Hazard Zone (south and west of the city). This increased risk could result in potentially significant impacts. Implementation of MM PSR-3 through MM PSR-5 would reduce potential impacts on fire protection services associated with wildfire risk to a less than-significant-level.

Mitigation Measures

MM PSR-3: Prior to issuance of the first building permit, the applicant shall implement a Fire Protection Plan. The applicant shall submit the Fire Protection Plan, along with maps of the project site and access roads/driveways, to the ECCFPD for review and approval prior to the issuance of any building permit

or grading permits. The Fire Protection Plan requires the applicant to enforce the following:

- a. Residents, employees, and employers shall implement passive protections (fuel modification, interior sprinklers, ignition resistant construction) designed to work with little human intervention.
- b. All future landowners will be provided with the prohibited plant list and vegetation management zone requirements and limitations. The project applicant shall maintain a community website that includes the prohibited plant list and vegetation management zone requirements and limitations. The project proponent shall also ensure that the prohibited plant list and provisions of the Fire Management Plan shall be enforced by recording applicable covenants, codes, and restrictions on each private lot. This will include guidance for residents, employees, and employers within the project site, on maintaining landscape and structural components according to the appropriate fire standards.
- c. Fire rules shall be posted on a business bulletin board for all businesses within the project site. These rules shall be posted in areas visible to employees, typically a break room or main office.

MM PSR-4: Prior to the issuance of a certificate of occupancy for any residential unit, all prospective landowners, or tenants as appropriate, within the project site shall be provided copies of the prohibited plants list and vegetation management zone requirements and limitations as set forth in the Fire Protection Plan.

Provisions in the prohibited plants list and vegetation management zone requirements shall be enforced by recording applicable covenants, codes, and restrictions on each project site as to the applicable plant use prohibitions and vegetation zone management requirements.

MM PSR-5: Prior to issuance of the grading permit, the applicant shall prepare a Long-Term Open Space Maintenance Implementation Plan.

The Long-Term Open Space Maintenance Implementation Plan shall be provided to the City, the East Contra Costa Fire Protection District, the Contra Costa County Fire Protection District, and the Brentwood Police Department for review and approval, with approval by all agencies prior to issuance of the first certificate of occupancy for the project. Upon approval, the applicant shall continuously implement the Long-Term Open Space Maintenance Implementation Plan for the duration of the project's operations. The maintenance plan shall include, but is not limited to, the following elements:

- Turf Care - Mowing, aerating, reseeding, top dressing, weed control.
- Irrigation - Adjustment and repair of automated watering of turf, trees, and shrubs.
- Disease and Insect Control - Monitoring, preventing, correcting, and management of disease and/or insects in turf, trees, shrubs either by natural or chemical methods.
- Hardscape Surfaces - Sweeping, blowing, and/or power washing of walkways, parking lots, and any other hardscape surfaces within or adjacent to open space areas.
- Repair - Maintenance required to facilities or open space amenities.
- Litter Removal - Emptying trash cans, replacing trash bags and picking up litter throughout the open space areas.
- Special Features - Maintenance of equipment or facilities such as benches, gathering areas, exercise stations, bocce courts, view overlooks, and multi-use lawn areas.

Implementation of MM PSR-3 through MM PSR-5 would reduce the risk of wildfire during the proposed project completion and operation. Therefore, impacts would be less than significant.

Impact Summary for Fire Protection Services

Policy CSF 4-1 of the City of Brentwood General Plan requires the ECCFPD and providers of emergency medical services to “maintain adequate staff and equipment to provide high quality and responsive fire protection and emergency medical services to existing and future growth in Brentwood.” As discussed in Chapter 3, the applicant is requesting a General Plan amendment from Semi-Public Facility to Residential-High Density, which would allow for the proposed residential development with a density range of 11.1 to 20.0 dwelling units per acre.

Currently, the project site is located within city limits and is surrounded by areas of residential and recreational uses that are within the service areas of the ECCFPD. The anticipated level of development that would result from the proposed project would increase calls for service and require additional facilities, staffing or other resources, such as a ladder truck or other fire service equipment. The proposed project would introduce buildings at a height that, by law, require ECCFPD to use a ladder truck. In addition, the proposed project would represent approximately one percent of the General Plan’s full population buildout within the city limits, made up of senior residents. This is within the City of Brentwood General Plan projections; however, it is the ECCFPD’s experience that housing for senior residents often has a higher rate of emergency medical calls (ECCFPD, 2017). The applicant is required to pay the City’s development impact fee pursuant to the Schedule of City Fees in effect at the time of project approval. The Fire Fee funds fire facilities and apparatus necessary for the safety of new development. While payment of this fee is intended to serve as full mitigation for impacts related to fire service (including response

to medical emergencies and equipment such as a ladder truck), the level of funding and timing for implementation of improvements has not been determined. As such, impacts would be significant and unavoidable until such time as a ladder truck can be obtained and the new station is constructed and/or sufficient comparable facilities and equipment are available and implemented.

Wildfire risk could increase as a result of the proposed project, due to the nature of open space management and the proximity of the project to areas categorized by CAL FIRE as a “Moderate” Fire Hazard Zone (south and west of the city). Mitigation measures MM PSR-3 though MM PSR-5 have been provided to reduce the proposed project’s physical effects on the ECCFPD.

Police Protection

The proposed project would result in the future construction of up to 560 age-restricted housing units. As indicated in Chapter 15, it is estimated that the project would result in a maximum increase of 840 senior residents to the proposed project site. This increase in population would likely increase calls for service, which in turn could require additional police staffing or other resources.

As stated in Section 16.3, officers patrolling the city are dispatched from police headquarters, located at 9100 Brentwood Boulevard, approximately 2.6 miles east of the project site. As discussed above, the construction of up to 560 age-restricted residential units would generate approximately 840 new senior residents, all of which are assumed to be “new” residents to the city.

During construction, the proposed project may attract vandals or other security risks and potentially increase traffic along State Route 4 (SR-4), Foothill Drive, and West County Club Drive that would increase demand on police protection/law enforcement services. The applicant would implement best management practices and standard construction site security by controlling site access to the project areas under construction. Project construction personnel commuting to the project site via nearby highways (SR-4) could increase services required by the CHP in the event of accident or traffic violations. Project construction personnel would be required to adhere to all Federal and State traffic laws. The additional volume of traffic associated with construction personnel commuting to the project site during construction is not expected to exceed the CHP’s ability to patrol the highways. This increase due to construction would be temporary in nature and impacts would be less than significant.

The proposed project could potentially affect response times and coverage ability by creating the need for additional police staff within the existing service area. However, according to the Brentwood Police Department, the increased demand generated by the proposed project would not require the construction of a new police station and police services would continue to be dispatched from the existing police headquarters.

Future development in the City of Brentwood could also have a potential impact on calls for service, which in turn may affect the average response times for priority calls for service. According to the Brentwood Police Department, the average response times for calls for service may be a factor in determining a need to increase staffing levels. However, it is unknown at this time how much of an effect development in the project area would have on police services in Brentwood, as different types of development dictate the types of calls for service received by the Brentwood Police Department.

The existing Police Department facility was planned for and constructed with the purpose of serving future development within the City of Brentwood, inclusive of the proposed project site in its current use as golf course and open space. In accordance with Policy CSF 3-5, consultation and coordination with the Brentwood Police Department during the review of new development applications is required. Further, Community Services and Facilities Actions 3a and 3b require preparation of an annual Brentwood Police Department Performance Report that includes the assessment of areas related to adequate police staffing that includes, but is not limited to: crime rates, response times, population, workload, financial resources, and performance standards. Community Services and Facilities Action 3c requires that during the development review process, the Police Department be consulted to ensure that project design features facilitate adequate police staffing and that the project addresses its impacts on police services. Adherence to these City of Brentwood General Plan policies and actions would ensure that any future increase in police services is planned for and budgeted in advance of the need for increased staffing.

Additionally, should future development require the existing Police Department to be expanded to support more staff (generated by development inclusive of and beyond the proposed project), the existing facility was designed to accommodate future expansion at its existing site. As a result, potential impacts on police protection services would be less than significant.

Schools

As mentioned above, the proposed project would result in the development of up to 560 age-restricted housing units, adding a maximum population of 840 people to the city's population. As discussed in Chapter 15, all proposed buildings would be used for senior facilities, which typically do not house families with school-aged children. While no standard generation rate exists for the BUSD and LUHSD, or the California State Allocation Board with respect to senior facilities, the proposed project's permitted uses would be reserved for residents of a certain age (typically age 55 and over). Therefore, the proposed project is not anticipated to generate a student population, given the age-restrictions on those living at Village One and Village Two. Impacts associated with an increased student population would be less than significant.

Further, the proposed project would be subject to school facility impact fees to mitigate any potential project-related increases in student enrollment. BUSD and LUHSD require the payment of development fees based on a per square foot basis of new development. Currently, school facility impact fees are at \$1.11 per square foot. The fees, which vary depending on the type of

land use (e.g., the fees for residential uses may be different than commercial or civic uses), would be collected at the building permit stage and are paid prior to building construction of the proposed project. The payment of school fees (under SB 50) as a mitigation is consistent with Section 65995(h) of the California Government Code and is considered mitigation for impacts on school facilities and potential impacts would be less than significant. Once funded, the school districts are responsible for identifying the location of new school facilities and undertaking acquisition, design, and construction of the facilities. As a result, impacts to schools would be less than significant.

The proposed project improvements are surrounded by single-family residential units that are not age-restricted. Therefore, while students may use the private golf cart pathways within the existing golf courses to get to and from school, these pathways are on private property and are not part of any designated safe routes to school. The proposed project would, however, provide walkable trails accessible to the community at the Shadow Lakes development portion of the proposed project. Therefore, the proposed project would provide a beneficial impact related to accessible walking trails, as these could provide off-street routes for students traveling to and from school.

In addition, any use of the existing golf course facilities by the schools is done under an agreement with the golf course management team. Currently, agreements are in place with the LUHSD and the to provide golf team practices on the golf course and to allow the lower Shadow Lakes parking lot to be used for overflow parking for Heritage High School. These agreements are reviewed annually and can change depending on LUHSD or BUSD needs, or golf course management needs. As stated by the applicant, the proposed project would enhance golf course facilities, by providing a better maintained and redesigned course, an enhanced clubhouse at Shadow Lakes, and a driving range that would have the potential to provide additional LUHSD golf team practice opportunities upon agreement with the golf course management team. Therefore, the proposed project would not change or alter the LUHSD's use of the golf course facilities and impacts would be less than significant.

Parks and Recreation

The Brentwood Parks and Recreation Department maintains parks, community facilities, and trails for public use throughout the City of Brentwood. The City of Brentwood General Plan outlines policies to ensure parks, trails, and recreation facilities citywide are maintained and sets park acreage standards for new development in the city. Policy CSF 2-2 is meant to achieve and maintain an overall citywide ratio of 5 acres of park land per 1,000 residents. Policy CSF 2-3 states that the ratio for Neighborhood Parks shall be 3 acres per 1,000 residents, and for Community Parks there shall be 2 acres per 1,000 residents.

As discussed above, the City of Brentwood has a current population of 61,055 and the City of Brentwood General Plan EIR projects a buildout population within the city limits of 80,917 by 2035. At a ratio of 5 acres of parkland per 1,000 residents, buildout of the City of Brentwood General Plan would result in a demand for 404.6 acres of developed parkland. The proposed

project's generation of 840 additional residents would require approximately 4 acres of parkland. The City currently has approximately 251 acres of developed parkland. Therefore, the City does not currently meet the ratio of 5 acres of parkland per 1,000 residents.

The proposed project would include approximately 333 acres of on-site outdoor uses. These uses would include, but would not be not limited to, a 191-acre golf course area and 142 acres of open space, trails, and other recreation opportunities, all of which would be available to both residents of the proposed project and existing beinghood residents. Therefore, the proposed project would not result in a change in parkland demand for the City of Brentwood.

In addition, the proposed project would be required to pay development fees per the City's established Development Fee Program to supplement the Parks and Trails Facility Fee. These fees are collected at issuance of building permit for new development, with fees determined by the fee schedule in effect at the time of permit issuance. As a standard condition of project approval, the applicant is required to pay the City's development impact fee pursuant to the Schedule of City Fees in effect at the time of project approval. The development impact fees are intended to finance public facilities necessary to mitigate the impacts generated by new development in the City of Brentwood and to ensure that new development pays its fair share of associated with the costs of mitigating its impact. As a result, impacts on City park facilities would be less than significant.

Libraries

The Brentwood Library is the only public library located in the City of Brentwood. Additional libraries exist within public schools located in the City; however, these libraries are intended to serve only the students. Due to the small size of the Brentwood Library, the library is often crowded. However, the library is part of the Contra Costa County Library System and therefore, the Brentwood library can access any other library within the Contra Costa County Library System for materials when needed. In addition, a new, larger facility is under construction on the corner of Oak Street and Third Street in the Downtown. This new facility is expected to open sometime in 2018 and would alleviate any existing issues related to small size and/or crowding.

The proposed project would add a maximum population of 840 senior residents to the City of Brentwood. This number assumes that all residents would be "new" and would not relocate from their existing homes within Brentwood. The new residents to the City of Brentwood may use City library facilities; however, this increase in use would not be expected to create a significant increase in demand on library facilities, services, or materials. Policy CSF 5-7 states that the City should pursue additional funding sources for library operations. The City has established a Development Impact Fee Program to supplement the Community Facility Fee Fund, which covers funding sources for public facilities, including library operations. These fees are collected at issuance of building permit for new development with fees determined by the fee schedule in effect at the time of permit issuance. As a standard condition of project approval, the applicant is required to pay the City's development impact fee pursuant to the Schedule of City Fees in effect at the time of project approval. The development impact fees are intended to finance

public facilities necessary to mitigate the impacts generated by new development in the City of Brentwood and to ensure that new development pays its fair share of associated with the costs of mitigating its impact. As a result, impacts on libraries would be less than significant.

Impact PSR-2: Would the project 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.

As discussed in Impact PSR-1, the proposed project's generation of 840 additional residents would require approximately 4 acres of parkland. However, the City currently has a total of approximately 251 acres of parkland. Therefore, the City does not currently meet the ratio of 5 acres of parkland per 1,000 residents.

The addition of 840 senior residents would not be anticipated to affect the City's ability to maintain its parkland standards because not all senior residents would be physically able to use the City's parkland. In addition, the proposed project would include approximately 333 acres of on-site outdoor uses including, but not limited to, a golf course, open space, trails, and other recreation opportunities, all of which would be available to both residents of the proposed project and existing neighborhood residents.

As a result, without a formal maintenance plan for this open space, the proposed project could result in physical deterioration of recreational facilities, including existing and newly created open space areas. This could result in a potentially significant impact. Implementation of Mitigation Measures PSR-3 through PSR-5, above, would ensure open space lands within the project area are developed and maintained in a manner that preserves and enhances the area's public views of scenic resources. As a standard condition of project approval, the applicant is required to pay the City's development impact fee pursuant to the Schedule of City Fees in effect at the time of project approval. The development impact fees are intended to finance public facilities necessary to mitigate the impacts generated by new development in the City of Brentwood and to ensure that new development pays its fair share of associated with the costs of mitigating its impact. Implementation of MM PSR-5 would require the applicant to prepare a Long-Term Open Space Maintenance Plan for maintenance of equipment and facilities and disease and insect control of open space. Implementation of mitigation measures would reduce impacts on parks and recreational facilities to a less-than-significant level.

Impact PSR-3: Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

City of Brentwood General Plan Policies COS 1-5, COS 1-7, and ED 5-2 ensure the provision and preservation of accessible open space in the City by recognizing urban open space as an important component of maintaining a high quality of life and encouraging public and private efforts to preserve and expand recreational opportunities for the city's residents and encourage

the growth of recreation activities within east Contra Costa County. Policy LU 4-2 requires that development projects provide adequate and appropriately located land, easements, or other accommodation for recreational uses and Policy CSF 3-4 provides guidance on using design of open space and recreational areas to prevent crime.

As discussed in Chapter 3, the proposed project includes the reconfiguration of the existing Shadow Lakes Golf Club and Deer Ridge Golf Club (18 holes each for a total of 36 holes) into a single, 18-hole golf course, with 10 holes north of Balfour Road in Shadow Lakes and eight holes south of Balfour Road in Deer Ridge. The 18 existing golf course holes to be closed would be repurposed into some form of open space or other amenities, such as, but not limited to walking trails, vineyards, community gardens, play areas, picnic areas, wildlife habitat areas, and other open space areas. Any of these amenities would be located within existing golf courses areas.

As discussed in Chapter 7, these developed golf course areas have the potential to support habitat for several special-status wildlife species, including white-tailed fox and western pond turtle. However, mitigation measures have been developed to avoid any impacts to these species during construction of the proposed project's open space and amenities. These measures include providing written notifications to the United States Fish and Wildlife Service and California Department of Fish and Wildlife; establishing construction buffer zones around any active nests; conducting pre-construction and construction monitoring; replanting saplings of any trees lost; and hiring a qualified arborist to prepare a Tree Removal, Protection, and Replacement Plan.

Implementation of the City of Brentwood General Plan policies discussed above, along with mitigation measures identified in this Draft EIR pertaining to biological resources, would reduce any potential impacts on recreational facilities to a less than-significant-level.

16.5.3 Cumulative Impact Analysis

The geographic area for the analysis of cumulative public service impacts in the City of Brentwood.

Impact PSR-4: Would implementation of the project, in combination with past, present, and reasonably foreseeable projects, result in significant cumulative impacts with respect to public services and recreation.

At buildout, the proposed project would result in up to 560 age-restricted housing units and an estimated 840 senior residents. With regards to police and fire protection services, the proposed project and past, present, and reasonably foreseeable projects would increase the demand for police protection and fire protection, but not to the point where new facilities or expanded facilities would be required.

The ECCFPD's operating budget is primarily generated through tax revenues and fees collected from penalties and requested services. Increased property tax from future cumulative projects would increase the City's funds in rough proportion to population increases. In addition, the

proposed project would implement Mitigation Measures PSR-1 through MM PSR-5. Therefore, the project proponent's payment of property taxes, development fees, and fair share funding, combined with the fees and funding paid by future cumulative projects would ultimately provide funding for improvements necessary to maintain adequate fire protection services, equipment, and/or personnel. The City's Fire Facility Fee Fund serves to provide necessary funding for fire facilities required to serve new development in the City through buildout as defined by the City of Brentwood General Plan. In addition, the City has identified development fees programmed for the construction of a new fire station on Shady Willow Lane; however, the timing of construction is currently unknown. With the City's Fire Facility Fee Fund; the City's established Development Fee Program to supplement the General Plan, Infrastructure Master Plans, and Capital Improvement Program; the property tax monies generated from future cumulative projects; and the proposed project's fair share funding, would combine to provide funding to the ECCFPD for adequate facilities, equipment, and personnel. While payment of this fee is intended to serve as full mitigation for impacts related to fire service (including response to medical emergencies and equipment such as a ladder truck), the level of funding and timing for implementation of said improvements had not been determined. Therefore, the proposed project, combined with past, present, and reasonably foreseeable future projects, would exceed those projections, and impacts to fire protection services would be significant and unavoidable.

With respect to law enforcement, as discussed previously, the City of Brentwood General Plan anticipates a buildout population of 80,917 by 2035. The proposed project would increase the population by 840 people (anticipated to be seniors aged 55 and older). Population growth would increase the number of service calls (both emergency and non-emergency) resulting in the need for police services. However, the increased property and sales tax from future cumulative projects would increase the City's funds in rough proportion to population increases. As a standard condition of project approval, the applicant is required to pay the City's development impact fee pursuant to the Schedule of City Fees in effect at the time of project approval. The development impact fees are intended to finance public facilities necessary to mitigate the impacts generated by new development in the City of Brentwood and to ensure that new development pays its fair share of associated with the costs of mitigating its impact. In addition, the proposed project would implement Mitigation Measures PSR-1 through PSR-5. Therefore, the project proponent's payment of property taxes, development fees, and fair share funding, combined with the fees and funding paid by future cumulative projects would ultimately provide funding for improvements necessary to maintain adequate Brentwood Police Department protection services, equipment, and/or personnel. In addition, the Brentwood Police Department facility was designed with the possibility of future expansion. Therefore, the proposed project, combined with past, present, and reasonably foreseeable future projects, would not exceed those projections, and impacts to police protection services would be less than significant.

With respect to schools, the proposed age-restricted housing facilities would not generate any new students and would therefore not increase the student population (K-12). Thus, the proposed project would not generate the need for new or physically altered school facilities, nor

would it generate the need for additional school staff. As discussed previously, the proposed project's permitted uses would be reserved for residents age 55 and over. Even with the age-restrictions, the proposed project would be subject to school impact fees. BUSD and LUHSD require the payment of development fees based on a per square foot basis of new development. Currently, school facility impact fees are at \$1.11 per square foot.

The fees, which vary depending on the type of land use (e.g., the fees for residential uses may be different than commercial or civic uses), would be collected at the building permit stage and are paid prior to building construction of the project. The payment of school fees (under SB 50) as a mitigation is consistent with Section 65995(h) of the California Government Code and is considered full and complete mitigation for impacts on school facilities and potential impacts are considered less than significant. Once funded, the school districts are responsible for identifying the location of new school facilities and undertaking acquisition, design, and construction of the facilities. Payment of statutory fees for new development is deemed adequate to address impacts to public schools. The applicant would be required to pay these fees and impacts. Therefore, the proposed project, combined with past, present, and reasonably foreseeable future projects, would not exceed those projections, and impacts to school services would be less than significant.

With respect to parks and recreation, the project applicant would be required to pay any applicable impact fees as part of the Development Fee Program to supplement the City of Brentwood General Plan, Infrastructure Master Plans, and Capital Improvement Program, thereby mitigating individual impacts. In addition, the proposed project would include approximately 333 acres of on-site outdoor and recreational uses including, but not limited to, a 191-acre golf course and 142 acres of open space, trails, and other recreation opportunities, all of which would be available to both residents of the proposed project and existing neighborhood residents. Therefore, the proposed project would not result in a change in parkland demand for the City of Brentwood because the project would provide new outdoor areas that would be open to the public.

The proposed project, and any future projects within the city, would be required to pay development fees per the City's established Development Fee Program to supplement the General Plan, Infrastructure Master Plans, and Capital Improvement Program. These fees are collected at issuance of building permit for new development, with fees determined by the fee schedule in effect at the time of permit issuance. Therefore, the proposed project, combined with past, present, and reasonably foreseeable future projects, would not exceed those projections, and impacts to park and recreational facilities would be less than significant.

With respect to library services, the proposed project would add a maximum population of 840 senior residents that may use City library facilities; however, this increase in use would not be expected to create a significant increase in demand on library facilities, services, or materials. The City has established a Development Fee Program to supplement the General Plan, Infrastructure Master Plans, and Capital Improvement Program. These fees are collected at

issuance of building permit for new development with fees determined by the fee schedule in effect at the time of permit issuance. The proposed project, and any future projects within the City, would be required to pay development impacts fees per the City's established Development Fee Program. Therefore, the proposed project, combined with past, present, and reasonably foreseeable future projects, would not exceed those projections, and impacts to library services would be less than significant.

16.5.4 Level of Significance after Mitigation

Table 16-1 (Summary of Impacts and Mitigation Measures – Public Services, Utilities & Service Systems) summarizes the environmental impacts, significance determinations, and mitigation measures for the proposed project with regard to public services.

Table 16-1: Summary of Impacts and Mitigation Measures – Public Services, Utilities & Service Systems

Impact	Impact Significance	Mitigation
<p>Impact PSR-1: Result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response time, or other performance objectives for any other the following public services:</p> <ul style="list-style-type: none"> • Fire protection; • Police protection; • Schools; • Parks and Recreation facilities; or • Libraries. 	<p>Less than Significant with Mitigation; Significant and Unavoidable regarding fire services and facilities</p>	<p>MM PSR-1: Develop and Implement a Fire Safety Plan MM PSR-2: Fire Safety Plan Compliance During Construction MM PSR-3: Implementation of Fire Protection Plan MM PSR-4: List of Prohibited Plans and Vegetation MM PSR-5: Long-Term Open Space Maintenance Plan</p>
<p>Impact PSR-2: Would the project 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.</p>	<p>Less than Significant with Mitigation</p>	<p>MM PSR-5: Long-Term Open Space Maintenance Plan</p>
<p>Impact PSR-3: Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.</p>	<p>Less than Significant</p>	<p>None required</p>
<p>Impact PSR-4: Would implementation of the project, in combination with past, present, and reasonably foreseeable projects, result in significant cumulative impacts with respect to public services.</p>	<p>Less than Significant with Mitigation; Significant and Unavoidable regarding fire services and facilities and emergency response times</p>	<p>MM PSR-1: Develop and Implement a Fire Safety Plan MM PSR-2: Fire Safety Plan Compliance Plan During Construction MM PSR-3: Implementation of Fire Protection MM PSR-4: List of Prohibited Plans and Vegetation MM PSR-5: Long-Term Open Space Maintenance Plan</p>

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16.6 References

CalRecycle. 2015a. *Solid Waste Facilities, Sites, and Operation*. Available at:

<http://www.calrecycle.ca.gov/SWFacilities/>

_____. 2015b. *Waste Characterization. Service Sector: Estimate Solid Waste Generation and Disposal Rates*. Available at:

<http://www.calrecycle.ca.gov/wastechar/wastegenrates/Service.htm>. Accessed October 15, 2015.

City of Brentwood. 2002. *City of Brentwood Parks, Trails, and Recreation Master Plan*. Available at: [http://www.brentwoodca.gov/mwg-](http://www.brentwoodca.gov/mwg-internal/de5fs23hu73ds/progress?id=Web85PZGRUDMDe1MmjmxcauiNWmvCYUWnanKpvF77IQ,&dl)

[internal/de5fs23hu73ds/progress?id=Web85PZGRUDMDe1MmjmxcauiNWmvCYUWnanKpvF77IQ,&dl](http://www.brentwoodca.gov/mwg-internal/de5fs23hu73ds/progress?id=Web85PZGRUDMDe1MmjmxcauiNWmvCYUWnanKpvF77IQ,&dl). Accessed August 9, 2017.

City of Brentwood. 2014a. *Public Draft Environmental Impact Report for the 2014 Brentwood General Plan Update*. Prepared by De Novo Planning Group.

City of Brentwood. 2014b. *Public Draft Environmental Impact Report for the 2014 Brentwood General Plan Update*. Prepared by De Novo Planning Group.

_____. 2016a. *Development Impact Fee Report Fiscal Year Ended*. Available at:

<https://www.brentwoodca.gov/civicax/filebank/blobdload.aspx?BlobID=36540>.

Accessed September 28, 2017.

_____. 2016b. *Urban Water Management Plan*. Prepared by Brown and Caldwell.

_____. 2017a. *Police*. Available at: <http://www.brentwoodca.gov/gov/police/default.asp>.

Accessed August 7, 2017.

_____. 2017b. *Library Expansion Project*. Available at:

http://www.brentwoodca.gov/residents/library_expansion_project/default.asp.

Accessed August 8, 2017.

_____. 2017c. *Parks & Recreation*. Available at:

<http://www.brentwoodca.gov/gov/parks/default.asp>. Accessed September 28, 2017.

_____. 2017d. *Brentwood Golf Course Redevelopment, Water Supply Assessment*. Prepared by Coleman Engineering

East Contra Costa Fire Protection District. 2016. *Deployment Performance and Headquarters Staffing Adequacy Study*. Available at: <https://www.eccfpd.org/about-the-district>.

Accessed September 28, 2017.

- . 2017. *About the District*. Available at: <https://www.eccfpd.org/about-the-district>. Accessed September 28, 2017.
- Eaton, Dana. 2017 (August 29). *Re: School Services/Facilities Questionnaire. Personal Communication Email Dana Eaton, Superintendent, to Sophia Lai, Planning Analyst.*
- Galey, Debra. 2017. *Re: Development Fees for License Plate Readers. Personal Communication Email Debra Galey, Management Analyst, to Sophia Lai, Planning Analyst.*
- Helmick, Brian J. 2017. *Re: Fire Protection and Emergency Medical Services/Facilities Questionnaire. Personal Communication Email Brian J. Helmick, Fire Chief, to Sophia Lai, Planning Analyst.* Received October 9, 2017.
- Romero, Vince. 2017. *Re: Electricity Services/Facilities Questionnaire. Personal Communication Email Vince Romero, Customer Relationship Manager, to Sophia Lai, Planning Analyst.*
- State Allocation Board. *Report of the Executive Officer, State Allocation Board Meeting, January 22, 2014*. Available at: www.documents.dgs.ca.gov/OPSC/Resources/Index_Adj_Dev.pdf. Accessed August 9, 2017.
- Brentwood Police Department. 2017. *Re: Law Enforcement Services/Facilities Questionnaire. Personal Communication Email Ben Tolero, Lieutenant, Police Department, to Sophia Lai, Planning Analyst.*
- Volta, Eric. 2017. *Re: School Services/Facilities Questionnaire. Personal Communication Email Eric Volta, Superintendent, to Sophia Lai, Planning Analyst.*
- U.S. Census Bureau. 2017. *Brentwood City, California*. Available at: https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml#. Accessed August 15, 2017.