

4.L Public Services

4.L.1 Introduction

This section describes existing public services provided to the Project Site and vicinity. It evaluates the impacts of the proposed development scenarios on the provision of public services and the physical impacts on the environment that would result from a need to construct new or physically altered facilities. Feasible mitigation measures are identified to reduce significant impacts. The analysis reviews police services, fire protection and emergency medical services, public schools, and libraries.

4.L.2 Police Services

Environmental Setting

Facilities and Services

The Brisbane Police Department (BPD) provides security and police services to the residents and businesses of Brisbane. The BPD has one location, its headquarters, located in City Hall at 50 Park Place less than 0.5 mile from the Project Site.

Staff and Resources

The BPD is staffed with 11 sworn officers and 2 civilian personnel. The staff is comprised of one chief, one commander, two sergeants, seven patrol officers, one community service officer, and one records clerk. Officers are assigned specialty positions; for example, there are two K9 Officers, two traffic officers, and one North County SWAT officer (BPD, 2011; Meisner, 2011). Current patrol staffing consists of a single beat with a minimum of one sergeant or shift supervisor and at least one other officer per shift (Meisner, 2011). Due to staffing cutbacks, the BPD has suspended its detective division and returned the employee to the patrol staff to ensure the Department's minimum patrol staffing standard is met.

The BPD maintains 13 vehicles: six patrol cars, two motorcycles, one pick-up truck, two unmarked detective vehicles, one unmarked administration vehicle, and one full-size special unit vehicle (Meisner, 2011).

Staff Standards

The current ratio of police officers per 1,000 residents is approximately 2.6, based on the city's 2010 population of 4,282 (see Section 4.K, *Population and Housing*, of this EIR). Based on a total resident and worker population of almost 13,000 in 2010, a citywide ratio of one officer per 1,000 residents and workers is currently provided.

Per BPD practice, a total of five sworn officers are required to staff a patrol beat with a single officer 24 hours per day, seven days per week. Currently, BPD officers work four 12-hour shifts

with four days off. This results in two shifts (dayshift and nightshift) and two teams, one of which is working the four days the other team is off. Considering there may be one officer on vacation, sick, or away at training at any given time, the result is that a minimum of five officers is required to cover each 24/7 shift. Exceptions include staffing for daytime positions such as Community Service Officers, Detectives, and School Resource Officers (Meisner, 2012).

Service Demand

Approximately 3,116 service calls were handled by the BPD in 2010. This equates to a ratio of about 240 calls per 1,000 residents and employees, based on the city's 2010 resident and employee population of 12,972. In 2010, there were 372 reported crimes in Brisbane, including 111 felonies and 261 misdemeanors. In addition, there were 50 accident reports taken and 1,249 traffic citations written by the BPD in 2010 (Meisner, 2011).

Brisbane has a very low crime rate compared to the national average. Brisbane's crime rate is also lower than the averages of both nearby Daly City and San Francisco, (Meisner, 2012). The average crime index¹ (in 2010, the latest year that data is currently available) in the United States is 319.1. Brisbane's crime index in 2010 was 99.1, which is significantly lower than any year since 2001. Likewise, Brisbane's crime rate is much lower than the areas adjacent to the Project Site: Daly City, with a crime index of 168.5; and San Francisco, with a crime index of 365.8 (CityData.com, 2012).

The Project Site currently has a low incidence of crime relative to Brisbane as a whole. Because the Project Site is primarily undeveloped, statistical data regarding total police services for the area are difficult to extrapolate. In 2010, 10 reports were taken from the established businesses and along roadways within the Project Site boundaries. The reports identified three burglaries, one act of vandalism, one driving under the influence, one act of public intoxication, one vehicle theft, one drug-related offense, one injury accident, and one theft. Officer-initiated activity or other calls for service not resulting in a police report are not reflected in these statistics. Other types of activity officers are likely to be engaged in or to be called for are suspicious subjects or activity, transient encampments, minor traffic accidents, and illegal dumping complaints (Meisner, 2011).

Service Standards

As noted below under "Regulatory Setting," Brisbane General Plan Policy 163 calls for a three-minute emergency response average and a 10-minute non-emergency response average for police services. The BPD responds within the three-minute emergency response average more than 95 percent of the time, and responds to non-emergency calls within five minutes 80 percent of the time (Meisner, 2011).

¹ Index crimes are the eight crimes the Federal Bureau of Investigation combines to produce its annual crime index. The Federal Bureau of Investigation created a common definition for crime comparison to compare statistical information on a national basis. The index seeks to overcome differences in individual state statutes and create a standardized definition of crime classification.

Regulatory Setting

The Brisbane City Council adopted the current General Plan in June 1994. The 2007-2014 Housing Element of the General Plan was adopted in 2011. Policies contained in the Land Use, Transportation and Circulation, and Community Health and Safety Elements of the City of Brisbane General Plan pertain to the provision of public services in general and police services more specifically and are listed below. Discussion of the Project's overall consistency with the City of Brisbane General Plan is provided in Section 4.I, *Land Use and Planning Policy*, of this EIR.

City of Brisbane General Plan policies generally relevant to public services provision for the proposed Project include the following:

Policy 27: Provide centrally located public facilities for public services and community events so as to maximize use by Brisbane residents and businesses.

City of Brisbane General Plan policies and programs pertaining to police services include:

Policy 160: Provide a level of police protection of persons and property proportional to the size and law enforcement needs of the community within budgetary constraints.

Program 160a: In conjunction with land use development applications, evaluate police service requirements and response times. Require impact fees and exactions to maintain the level of service.

Policy 163: Continue to ensure a three minute emergency response average and a ten minute average response to other calls for service.

Significance Criteria

Per Appendix G of the CEQA Guidelines, the Project would have a significant effect on the environment if it were to:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, 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.

Impact Assessment Methodology

The environmental impact analysis for public services in this EIR involves an assessment of existing police services currently provided to the existing Brisbane community as well as existing standards and capacity. Current information about service capabilities, service ratios, response times, performance objectives, number of apparatus devoted to the Project Site vicinity, were obtained through correspondence with BPD and through the review of relevant web-based information. This information was used in conjunction with Association of Bay Area Governments (ABAG) projections for Brisbane and the Bay Area region in 2035 (see Section 4.K, *Population and Housing*, of this EIR) to calculate Project-related growth and anticipated demand for police services. Additionally, the Project was evaluated for conformity

with the goals, objectives, and policies of the City of Brisbane General Plan related to the provision of public services.

This analysis focuses on how projected growth resulting from Project Site development could affect the demand for police services at the Project Site and elsewhere in Brisbane such that the construction of new or altered facilities would be required. The analysis of public services and impacts related to the need for new and/or expanded police facilities are based on the housing and population projections described in Section 4.K, *Population and Housing*, of this EIR.

Project Impacts and Mitigation Measures

Impact 4.L-1: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, 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?

Impact Significance by Scenario (before Mitigation)			
DSP	DSP-V	CPP	CPP-V
SM	SM	SM	SM
SU = Significant Unavoidable SM = Significant but Mitigable LTS = Less than Significant - = no impact			

Development of the Project Site would substantially increase the daytime worker population on the Project Site. **Table 4.L-1** shows the projected increase in calls for police service per 1,000 persons.

**TABLE 4.L-1
 PROJECTED CALLS FOR POLICE SERVICE BY SCENARIO**

	Resident and Employee Population	New Projected Calls for Service per 1,000 population ^a	Total Calls for Service
2010 City of Brisbane	12,972	N/A	3,116
DSP	27,428	6,583	9,699
DSP-V	25,354	6,085	9,201
CPP	16,191	3,886	7,002
CPP-V	16,073	3,858	6,974

^a Projected calls for service are based on the 2010 ratio of 240 calls per 1,000 residents and employees.

N/A = not applicable

SOURCE: Meisner, 2011; ESA, 2011.

Given the anticipated increase in the demand for police services under Project Site development, and the fact that the Project Site is relatively isolated from the rest of the city, new development within the Project Site other than relocation or expansion of existing uses would stretch the capabilities of the Brisbane Police Department to the point that its current one-beat system could not maintain desired response times (Macias, 2011).

By substantially increasing worker population (and resident population in the DSP and DSP-V scenarios), Project Site development would require additional 24/7 shifts. Each additional shift would require expanding the BPD by five sworn officers as described above under “Facilities and Services.” An additional civilian employee, such as a community service officer, would also be required to handle non-emergency police duties such as parking enforcement, abandoned vehicle enforcement, and evidence management. Along with establishment of a second patrol beat to serve the Project Site, the City would need to purchase patrol vehicles and other equipment.

New and expanded facilities needed to accommodate these increases in staffing requirements are analyzed below for each of the four proposed development scenarios.

DSP and DSP-V

Increased Demand for Services

The DSP and DSP-V scenarios would introduce a substantial resident population, as well as substantial non-residential development, to the Baylands. This increase in resident and worker population can be expected to result in increased demand for service from the BPD.

In total, the DSP or DSP-V would include construction of approximately 12 million square feet of new floor space in buildings ranging up to 160 feet in height, resulting in more dense development than other parts of Brisbane. The majority of development would be residential, commercial, office, civic, and retail uses typically found in dense urban settings. Research and development, entertainment, institutional, industrial, and service industry land uses, such as a hotel and conference center, are also proposed.

As shown in Table 4.K-12, projected buildout of the Project Site under the DSP or DSP-V scenario would result in development of 4,434 residential units with 9,888 residents. Non-residential development in these scenarios would result in approximately 15,466 (DSP-V) to 17,540 (DSP) workers employed within the Project Site at buildout. Retail, office, hotel, entertainment, and other commercial uses, as well as planned open space and recreation uses, would also bring visitors to the Project Site, increasing the overall daytime and evening population.

The DSP and DSP-V scenarios also reserve two specific sites within the Icehouse District for the development of institutional uses, including a charter high school (see Figures 3-11 and 3-13 in Chapter 3, *Project Description*, of this EIR) (UPC, 2011). The BPD does not currently employ a dedicated school resources officer, since the BPD has only elementary and middle schools within its service area. High schools bring unique law enforcement challenges requiring a dedicated school resources officer/juvenile officer. Therefore, development of a high school within the Project Site would create a need for one additional BPD officer to serve as a school resources officer/juvenile officer.

Given the size of the proposed development, in terms of both its geographic area and its estimated resident and employee population, development of the Project Site would require expanded police services. The need for increased police services under the DSP or DSP-V scenario is related to increases in traffic congestion, vehicle accidents, auto burglaries, robberies, commercial and

financial crimes,² crimes against persons, residential burglaries, and domestic-related incidents (Meisner, 2011). Specifically, the new residential population is anticipated to generate an increase in crimes against persons and domestic-related calls for nighttime service.

To accommodate this needed increase, meet the current BPD standard of staffing requirement of one officer per 1,000 residents and workers, and maintain acceptable response times, the BPD determined that it would need two additional 24/7 shifts added to its patrol staffing, thus requiring an additional 10 officers plus the additional civilian employee described above. This would ensure a minimum of four BPD officers on duty in the city at all times and provide equivalent coverage and response times to development within the Project Site as it currently provides. The DSP or DSP-V scenario would also require the addition of at least one patrol vehicle to the fleet, including radio, light bar, and other associated emergency equipment (Meisner, 2012). As described below, additional officers would be needed during special events under the DSP-V.

In total, up to 12 additional personnel and one patrol car (Meisner, 2012) would be required to accommodate proposed development under the DSP and DSP-V scenarios. The increase in staffing would be expected to take place over time throughout Project Site development. The greatest staffing need, i.e., worst-case scenario, would be created through development of the DSP or DSP-V scenario with an approved high school. In this scenario, the BPD would require a maximum of 13 BPD employees working out of the existing station during any one time.

As described in Chapter 3, *Project Description*, of this EIR, the DSP-V includes a 17,000- to 20,000-seat sports arena and a 5,500-seat concert theater. Such venues would not create an increased need for ongoing and regular patrol time, beyond what is anticipated for development under the DSP. However, additional police service would be required during large-scale events for security and traffic control purposes. Following the model used by the Daly City Police Department for events at the Cow Palace, during such events at the Project Site, the BPD would provide officers for duty at the venue on overtime, as paid by the venue or event organizer. Staffing needs for such events would be determined on the basis of event type and size, and on the requirements of the event sponsor.

To ensure (per City of General Plan Policy 27) that centrally located police facilities are provided to serve the Project Site and that adequate response times can be maintained throughout the City, required specific plan(s) for development within the Project Site would be required as part of the planning review process to prepare and implement a Police Services and Facilities Plan, subject to City approval, to define specific timing requirements for establishment of additional police shifts based on the progression of development within the Project Site. The plan will, at a minimum, provide for:

- Establishment of a new 24/7 officer shift and one civilian daytime shift within the Brisbane Police Department along with the equipment needed to support the additional shift prior to issuance of the first Certificate of Occupancy for any new development within the Project

² Financial crimes include but are not limited to fraud, theft, scams, tax evasion, bribery, identity theft, forgery, and counterfeiting. Financial crimes may be carried out by individuals, corporations, or groups and victims may be individuals, corporations, or groups.

Site, other than relocation or expansion of an existing use, with provision for establishment of additional 24/7 officer shift(s) as determined necessary by the Brisbane Police Department.

- Construction and initiation of operation of storefront police substation(s) within the Project Site to accommodate additional required staff to be completed prior to issuance of the first Certificate of Occupancy for any new development within the Project Site, other than relocation or expansion of an existing use. The facility would be sized to accommodate a waiting area, interview room, rest room, and storage area, and to allow officers assigned to the designated patrol beat for the Project Site to take reports while remaining within the beat area. The retail substation would be located within a commercial ground floor storefront such that it is easily visible and accessible to the general public.
- Should the DSP-V scenario be selected, construction of a dedicated space within the proposed arena for police use would be provided for use in planning, briefing, deploying, and general management of law enforcement personnel during an event. This event facility space shall be large enough to handle officers, support staff, and storage.

New Facilities Construction

Although the BPD would require increased staffing levels, the existing police station is currently under capacity and has adequate space to hold all of the new officers that would be needed to adequately serve the project under both the DSP and DSP-V scenarios. The design and space allocations of the existing station can accommodate this number of employees comfortably, and therefore no new or physically expanded facility would be required to maintain acceptable staffing ratios at project buildout and to serve the Project (Meisner, 2012). However, given the location of the proposed development in relation to downtown Brisbane and the existing police station, the BPD has determined that a desired response times could not be maintained without a storefront community police facility (retail substation) within the Project Site (Macias, 2011). Although the DSP and DSP-V scenarios designate a specific site within the Icehouse District for the development of institutional uses, including a combined police/fire facility, a combined facility would not be considered by the BPD, as its functionality would be limited (Macias, 2011).

Conclusion: Because desired response times could not be maintained under the DSP and DSP-V scenarios, given the location of the Project Site in relation to existing police facilities, and the construction of new facilities would be required.

CPP and CPP-V

Increased Demand for Services

Under the CPP or CPP-V scenario, no residential units would be constructed, and there would therefore be no resident population within the Project Site. However, development under the CPP or CPP-V scenario would result in approximately 15,862 to 16,191 employees working within the Project Site. Retail, office, hotel, conference facilities, and other commercial components, as well as planned open space and recreation uses, would also bring visitors to the Project Site, increasing the overall daytime and evening population.

The CPP and CPP-V scenarios propose approximately eight million new square feet of development, primarily in the northwestern portion of the Project Site. Building heights would range up to a maximum of 160 feet. Land uses proposed by the CPP and CPP-V scenarios include mixed-use retail, commercial, office, research and development, hotel/conference center, entertainment/cultural, civic use, industrial, institutional, and public open space.

The BPD concerns for development under the CPP and CPP-V scenarios are related to increases in traffic congestion, vehicle accidents, auto burglaries, robberies, and commercial and financial crimes (Meisner, 2011). To handle this demand, the BPD anticipates a need to add one 24/7 shift and one day shift to its patrol staffing, thus requiring eight additional officer employees (five to cover the 24/7 shift and three to cover the day shift) plus the additional civilian employee described above. This would ensure a minimum of three BPD officers on duty at night and four BPD officers during the day. The CPP or CPP-V scenario would not, however, require the addition of a patrol car or equipment (Meisner, 2012).

The CPP and CPP-V scenarios designate a specific site at the base of Icehouse Hill for the development of a charter high school. Development of a high school within the Project Site also would create a need for one additional BPD officer to serve as a school resources officer/juvenile officer.

To ensure (per City of General Plan Policy 27) that centrally located police facilities are provided to serve the Project Site and that adequate response times can be maintained throughout the City, the Police Services and Facilities Plan, discussed above, will also be implemented in the CPP and CPP-V scenarios.

New Facilities Construction

Although the BPD would require increased staffing levels to serve development under the CPP and CPP-V scenarios, the existing police station is currently under capacity and has adequate space to hold the new officers that would be needed to adequately serve the project under all four scenarios. The design and space allocations of the existing station can accommodate this number of employees comfortably, and therefore no new or physically expanded facility would be required to maintain acceptable staffing ratios at Project Site buildout and to serve the Project (Meisner, 2012). However, given the location of the proposed development within the Project Site in relation to downtown Brisbane and the existing police station, the BPD has determined that desired response times could not be maintained without a storefront community police facility within the Project Site (Macias, 2011).

Conclusion: Because desired response times cannot be maintained under the CPP and CPP-V scenarios, given the location of the Project Site in relation to existing police facilities, addition of new police beat(s) would be required as part of implementation of the previously discussed Police Services and Facilities Plan.

Mitigation

Mitigation Measure 4.L-1: A site for a storefront substation that is easily visible and accessible to the general public and sized large enough to accommodate operations described in the Police Services and Facilities Plan shall be provided as required by the Brisbane Police Department.

Mitigation Measure Applicability by Scenario			
DSP	DSP-V	CPP	CPP-V
✓	✓	✓	✓
✓ = measure applies - = measure does not apply			

Conclusion with Mitigation: Implementation of **Mitigation Measure 4.L-1** along with preparation and implementation of the Police Services and Facilities Plan would ensure that Project Site development-related increases in the demand for police services are met and overburdening of the Police Department is avoided. The physical impacts associated with the construction and operation of new substation(s) within the Project Site have been considered along with the construction-related impacts analyzed and discussed in other sections of this EIR, and the following measures have been proposed to minimize construction-related impacts: **Mitigation Measures 4.B-2a, 4.B-2b and 4.B-3** (construction air emissions); **Mitigation Measures 4.C-1a through 4.C-1c, Mitigation Measures 4.C-2a through 4.C-2c, and Mitigation Measures 4.C-4d and 4.C-4e** (biological resources); **Mitigation Measures 4.D-2 and 4.D-4** (archaeological resources and human remains); **Mitigation Measure 4.E-2a** (ground settlement); **Mitigation Measures 4.G-2a, 4.G-2b, 4.G-2d and 4.G-2f through 4.G-2h** (hazardous materials); **Mitigation Measures 4.J-4a and 4.J-4b** (construction period noise); and **Mitigation Measure 4.N-12** (construction circulation patterns). Therefore, operational impacts associated with new police facilities are assumed as part of the overall analysis of land uses associated with the proposed development scenarios.

With implementation of the construction and operational measures proposed in other sections of this EIR, along with preparation and implementation of the Police Services and Facilities Plan described above, impacts on police services would be reduced to a less-than-significant level.

4.L.3 Fire Protection

Environmental Setting

Facilities and Staffing

Formed in 2003, the North County Fire Authority (NCFA) is a Joint Powers Authority that provides fire protection, emergency medical, and other hazardous assistance services to the communities of Brisbane, Daly City, and Pacifica. The NCFA operates nine fire companies in eight fire stations throughout its 60-square-mile service area. There are eight engines, and one aerial ladder. There are at least three firefighters, including at least one paramedic, assigned to each engine and the aerial ladder truck. In addition, two battalion chiefs and one deputy fire chief are on duty at all times. Overall, the NCFA maintains 30 personnel on duty daily (NCFA, 2011).

The Project Site is served by NCFCA Fire Stations No. 81 and No. 93. The closest fire station to the Project Site is NCFCA Fire Station No. 81, located at 3445 Bayshore Boulevard in Brisbane, outside of, but immediately adjacent to the southwestern edge of the Project Site. In 2010, severe mold was detected in this station building, and Fire Station No. 81 firefighters are currently being housed in adjacent semi-permanent trailers. The primary response area for this station is the area within the Brisbane city limits. The station is staffed by one three-person engine company (NCFCA, 2011). NCFCA Fire Station No. 93, located at 464 Marin Street in Daly City, is approximately one mile from the Project Site. This station is also staffed by a three-person engine company (NCFCA, 2011). NCFCA Fire Station No. 92 is located on the west side of San Bruno Mountain, approximately 2.5 miles from the Project Site.

The NCFCA's Fire Prevention Services Bureau seeks to ensure that all new buildings comply with state and local building and fire code requirements. To enforce standards for features such as sprinkler and fire alarm systems and emergency vehicle access, the Services Bureau conducts over 1,500 plan reviews and construction inspections annually.

In addition to its firefighting and emergency medical response capabilities, the NCFCA, through its Training and Special Operations Divisions, train for and respond to emergencies involving hazardous materials, as well as incidents involving cliff/high angle, water or trench rescue, urban search and rescue, confined space and structural collapse (NCFCA, 2011). The City, through its Office of Emergency Services, has developed an Emergency Operations Plan that provides procedures and establishes responsibilities for providing emergency support during a disaster. This plan works in concert with a number of multi-agency mutual aid plans and with local volunteer efforts. The designated Primary Emergency Operations Center is at 50 Park Place (City Hall) in the BPD Training room. Regular training sessions and drills are conducted at the center using the plan (City of Brisbane, 2013).

As noted above, NCFCA, as a first responder, is responsible for providing both fire protection and emergency medical services. Therefore, the service demands and standards set forth below are assumed to apply both to the fire protection and emergency medical services provided by NCFCA.

Service Demand

The NCFCA responded to approximately 9,774 calls within its service area in 2010. The majority (61 percent) of these calls were for medical emergencies. Four percent of the calls were regarding structural fires and the remaining 35 percent were categorized as "other."

NCFCA Fire Station No. 81 responded to approximately 644 calls for service in 2010. The majority of these calls (57 percent) were categorized as "other," while 35 percent pertained to medical emergencies and 8 percent were regarding structural fires (Panacci, 2011)

Service Standards

The NCFCA maintains the following performance standards and established goals (Myers, 2011):

- Seven-minute Total Reflex Time³ for a single fire company (first responder) for 90 percent of incidents;
- Eleven-minute Total Reflex Time for multiple fire companies for 90 percent of all structure fires;
- Fire Confinement Success Rate – holding structure fires to floor or origin (i.e., preventing the fire from spreading to additional floors after first arrival on the scene) for 90 percent of structure fires; and
- Fire Company Reliability –whereby 90 percent of all incidents are handled by the district fire company in 2010, the NCFA achieved an emergency, single fire company total reflex time of less than 7 minutes 92 percent of the time, thus exceeding the NCFA’s established goal. The NCFA does not set response time goals for non-emergency calls (Panacci, 2011).

In addition to internal performance standards, the Insurance Services Office, Inc. and the National Fire Protection Association set forth recommendations for performance standards. Together, these include the following (Myers, 2011):

- All development within 1.5 miles of a fire station;
- All development within 2.0 miles of a ladder truck;
- Four-minute Travel Time of a first due fire company for 90 percent of incidents;
- Eight-minute Travel Time of multiple fire companies for 90 percent of incidents; and
- Four-person minimum staffing on all fire companies.

While the NCFA maintains a goal of meeting Insurance Services Office, and National Fire Protection Association recommended standards, the only standard being met at this time is that of the fire station proximity to development within the service area.

Regulatory Setting

State Regulations

The California Health and Safety Code, Section 13000, et seq., includes regulations concerning building standards (as also set forth in the California Building Code), fire protection systems, fire protection devices (such as extinguishers and smoke alarms, and high-rise building standards), and standards for building inspection and certification.

Local Regulations

The City, through the Buildings and Construction Code of the Municipal Code, adopted by reference the 2010 edition of the California Fire Code. Chapter 15.44 of the Building and Construction Code contains the Fire Prevention Code. The Fire Prevention Code mandates certain

³ “Total Reflex Time” is measured from the time a call is received at the county communications center to the arrival of the first apparatus at the scene. Typically, for the public, the response time clock begins when an individual becomes aware there is an emergency incident occurring. While the difference between the two may vary by only a minute or two, the distinction is significant in that fire service response time goals are set to measure fire service performance from the moment the emergency enters the system.

requirements, including, among other things, that plans submitted in support of an application for a building permit must first be reviewed by the fire department.

The Brisbane City Council adopted the current General Plan in June 1994. The 2007-2014 Housing Element of the General Plan was adopted in 2011. Policies contained in the Land Use, Transportation and Circulation, and Community Health and Safety Elements of the City of Brisbane General Plan pertain to public services in general and fire services in particular and are listed below. Discussion of the Project's overall consistency with the City of Brisbane General Plan is provided in Section 4.I, *Land Use and Planning Policy*, of this EIR.

The Land Use Element of the City of Brisbane General Plan provides:

Policy 27: Provide centrally located public facilities for public services and community events so as to maximize use by Brisbane residents and businesses.

The Transportation and Circulation Element of the City of Brisbane General Plan provides:

Policy 39.2: Establish an alternative access route to the Tunnel Avenue overcrossing for emergency vehicles.

Policy 44: Maintain and improve local residential streets to accommodate safe access for emergency vehicles and evacuation routes for residents.

Policy 50: In the design of internal circulation systems for new development or expansions of existing uses, provide for adequate emergency access around all buildings.

The Community Health and Safety Element of the City of Brisbane General Plan provides:

Policy 156: Take advantage of technology to require built-in fire safety systems using appropriate materials and technology.

Policy 157: Administer and enforce health and safety codes related to fire safety on an on-going basis.

Program 157b: Enforce the provisions of the California Building Code and the California Fire Code and the Zoning Ordinance to address access, exiting, setbacks, materials and other design factors that contribute to fire safety.

Policy 158: Provide a level of fire protection proportional to the size, risks and service demands of the community within budgetary constraints.

Program 158a: In conjunction with development applications, evaluate fire service requirements, response times and levels of risk. Require impact fees and exactions to maintain the level of service and to provide for any special equipment needs.

Policy 208: If new development occurs, require infrastructure to be installed to City standards.

Program 208x: In conjunction with land use development applications for vacant lands, require studies to estimate the needs for domestic water and fire protection and require infrastructure to be designed and installed, at the developer's expense, to the satisfaction of the City.

Significance Criteria

Appendix G of the CEQA Guidelines indicates that a project would have a significant effect on the environment if it were to:

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

Impact Assessment Methodology

The environmental impact analysis for fire services in this EIR involves an assessment of existing services currently provided to the existing Brisbane community, as well as existing standards and capacity. The methodology included corresponding with the NCFCA to request current information about service capabilities, service ratios, response times, performance objectives, number of apparatus devoted to the Project Site vicinity and other factors and reviewing web-based information. The methodology used to calculate the Project Site development’s anticipated resident and employee population growth and associated demand for fire protection services is based on the ABAG projections for Brisbane and proposed Project Site development (see Section 4.K, *Population and Housing*, of this EIR). Additionally, the Project was evaluated for conformity with the goals, objectives, and policies of the City of Brisbane General Plan related to the provision of fire services.

This analysis focuses on how projected growth resulting from development of the Project Site, for each proposed development scenario, could affect the demand for fire protection services at the Project Site and in the vicinity such that the construction of new or altered facilities would be required. The analysis of public services and impacts related to the need for new and/or expanded fire protection facilities is based on the housing and population projections described in Section 4.K, *Population and Housing*, of this EIR. Water supply and flow for fire suppression purposes are discussed in Section 4.O, *Utilities, Service Systems, and Water Supply* of this EIR.

Project Impacts and Mitigation Measures

Impact 4.L-2: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable staffing ratios, response times or other performance objectives?

Impact Significance by Scenario (before Mitigation)			
DSP	DSP-V	CPP	CPP-V
SM	SM	SM	SM
SU= Significant Unavoidable SM = Significant but Mitigable LTS = Less than Significant - = no impact			

DSP and DSP-V

As shown in Table 4.K-12, projected buildout under the DSP or DSP-V scenario would result in development of 4,434 residential units with 9,888 new residents. Non-residential development in

these scenarios would result in approximately 7,088,800 (DSP) to 7,135,300 (DSP-V) square feet of non-residential development with an estimated 15,466 (DSP-V) to 17,540 (DSP) workers employed within the Project Site at buildout. The increased development and population would generate additional calls for service to the NCFCA.

The DSP and DSP-V scenarios would also result in a more intense level of development than is found in other parts of Brisbane. The DSP and DSP-V scenarios would allow approximately 12 million square feet of new development, the majority of which would be devoted to residential, commercial, office, civic, and retail uses typically found in dense urban settings, including mid-rise buildings for which a ladder truck is required to provide adequate response during a fire. Research and development, entertainment, institutional, industrial, and service industry land uses, such as a hotel and conference center, are also proposed.

New development under the DSP and DSP-V scenarios would be required to meet the NCFCA standards related to fire hydrant placement, fire flow requirements, installation of fire protection devices, and other fire code requirements. All new structures built within the Project Site, including residential, commercial, and other non-residential uses would be required to comply with applicable building and fire code requirements, which include, for example, the installation of fire protection devices (such as extinguishers, fire alarms, and automatic sprinkler systems).

A number of policies and programs of the Health and Safety Element of the Brisbane General Plan – including, but not limited to, Policy 158, Program 158a, Policy 208, and Program 208x – would further define construction and development.

Both the DSP and DSP-V scenarios include a circulation plan designed to ensure appropriate emergency access to and from the Project Site and to provide access to all development areas through the above-cited new roadways (specifically to facilitate NCFCA's emergency response within the Project Site). Further, all development within the Project Site would be designed in accordance with City and NCFCA standards, which include provisions that address emergency access (e.g., minimum street widths, minimum turning radii). In addition, emergency vehicles would be able to utilize transit lanes when streets are congested. As discussed in Section 4.N, *Traffic and Circulation* (see Impact 4.N-16), adequate emergency access would be ensured through the requirement that any specific plan adopted for the Project Site shall include measures to ensure that physical or traffic congestion impediments that would prevent emergency vehicles from traveling to and from an emergency situation are avoided.

The DSP and DSP-V scenarios would be supported by new Project Site development that would include roadway and infrastructure systems improvements within the Project Site (see Section 4.N, *Traffic and Circulation*, and Section 4.O, *Utilities, Service Systems, and Water Supply* of this EIR). These improvements, which would include more efficient roadways providing access to the interior of the site, as well as upgraded and extended water, wastewater, and telecommunications systems, would enable emergency vehicles to reach development on the Project Site.

All individual applications for development plans, including new local streets, private internal circulation, and specific building site plans, would be subject to review and approval by the City, including emergency service providers, per the City's plan approval process set forth in Brisbane Municipal Code Section 15.44.030. Individual development applications for large-scale entertainment venues, industrial development, renewable energy generation facilities, waste management land uses, and water recycling facilities within the Project Site, would require additional review by the NCFCA for special fire hazards, which is also a part of the City's plan approval process. Fire hazards and hazardous material use on the Project Site are described and evaluated in Section 4.G, *Hazards and Hazardous Materials*, of this EIR.

Proposed new development under the DSP and DSP-V scenarios would generate additional demand for fire and/or emergency services. Because Project Site development under the DSP and DSP-V scenarios would more than double the 2010 resident and employment population of Brisbane, it can be anticipated that that Project Site development would result in a more than doubling of the annual 644 service calls Station No. 81 has received for its Brisbane service area.

As noted above, while the NCFCA maintains a goal of meeting Insurance Services Office, Inc. and National Fire Protection Association recommended standards, the only standard currently being met is that of the fire station proximity to development within the service area (Myers, 2011; Panacci, 2011). Thus, Project Site development would require additional fire protection personnel and/or equipment in order to meet NCFCA's emergency service response time goals within the Project Site without impacting existing services currently provided to the Brisbane community.

Because existing NCFCA facilities and staffing are not meeting current response goals, Project Site development-related impacts on existing fire protection services would begin occurring when combustible materials are first brought onsite. As a result, new and/or expanded fire facilities would be required to accommodate the additional companies needed to meet the NCFCA response standards cited above within the Project Site. In particular, construction of relocated and/or combined station would be necessary for emergency response or access purposes, should a third Project Site access point be required near the intersection of Guadalupe Canyon Parkway and Bayshore Boulevard.

To ensure adequate fire protections services and facilities to support Project Site development and to maintain adequate response times throughout the City, required specific plan(s) for development within the Project Site would be required as part of the planning review process to prepare and implement a Fire Protection Services Plan that provides for the timely provision of fire protection facilities, equipment, and staffing. The Fire Protection Services Plan shall specify the means and methods that would be employed, over time, to ensure that the following performance standards are met:

- All Project Site development located within 1.5 miles of a fully staffed (four-person minimum staffing for all fire companies) and equipped NCFCA fire station.
- All buildings greater than three stories in height located within two miles of a fully staffed (four-person minimum) and equipped ladder truck company.

- Adequate fire flow and service pressure available per NCFAs standards.
- Expansion of existing fire stations or construction of new stations as needed to meet the following response time standards of the NCFAs within the Project Site:
 - Seven-minute Total Reflex Time⁴ for a single fire company (first responder) for 90 percent of incidents;
 - Eleven-minute Total Reflex Time for multiple fire companies for 90 percent of all structure fires;
 - Fire Confinement Success Rate – ability to hold structure fires to floor or origin (i.e., preventing the fire from spreading to additional floors after first arrival on the scene) for 90 percent of structure fires; and
 - Fire Company Reliability –ability to handle 90 percent of all incidents within the Project Site from the station within whose primary service area the Project Site is located.

CPP and CPP-V

Under the CPP or CPP-V scenario, no residential units would be constructed; therefore, there would be no resident population at the Project Site. However, development under the CPP or CPP-V scenario would result in over 7.0 million square feet of non-residential building area with approximately 15,862 to 16,191 employees working at the Project Site. Because this would more than double employment within the City, Project Site development under the CPP and CP-V scenarios would result in a substantial increase in calls to the NCFAs for service. As with the DSP, land uses proposed by the CPP or CPP-V include mixed-use retail, commercial, office, research and development, hotel/conference center, entertainment/cultural, civic use, industrial, institutional, and public open space.

As described above for the DSP and DSP-V scenarios, development under the CPP and CPP-V scenarios would require the construction of a new roadway network and new infrastructure systems similar in scale to those proposed under the DSP and DSP-V scenarios (see Section 4.N, *Traffic and Circulation*, and Section 4.O, *Utilities, Service Systems, and Water Supply* of this EIR). As noted above, these improvements would enable emergency vehicles to reach development on the Project Site.

The CPP-V scenario would also include an expansion of the Recology facility. Because all infrastructure and utilities systems are currently in place on the existing Recology site, development under the CPP-V scenario would not result in impacts different from the CPP with respect to the provision of fire protection, since the facility would include onsite fire protection (e.g., sprinkler systems) and the building area and number of employees would not increase substantially beyond that of the CPP scenario.

⁴ “Total Reflex Time” is measured from the time a call is received at the county communications center to the arrival of the first apparatus at the scene. Typically, for the public, the response time clock begins when an individual becomes aware there is an emergency incident occurring. While the difference between the two may vary by only a minute or two, the distinction is significant in that fire service response time goals are set to measure fire service performance from the moment the emergency enters the system.

As described above for the DSP and DSP-V, proposed new development under the CPP and CPP-V scenarios would generate additional demand for fire and/or emergency services, requiring additional fire protection personnel and/or equipment in order to meet NCFAs emergency service response time goals without impacting existing services currently provided to the Brisbane community. Because existing NCFAs facilities and staffing are not meeting current response goals, Project Site development-related impacts on existing fire protection services would begin occurring when combustible materials are first brought onsite for construction. As a result, new and/or expanded facilities would be required to accommodate the added personnel and equipment needed to achieve and maintain NCFAs response time goals. In addition, construction of a relocated and/or combined first station would be necessary for emergency response or access purposes, should a third Project Site access point be required near the intersection of Guadalupe Canyon and Bayshore Boulevard.

Conclusion: Development of the Project Site under the DSP or DSP-V scenario is expected to more than double current fire service demands within the City, while development of the CPP or CPP-V scenario would nearly double fire service demands within the City. Increased demand of such a magnitude would require a new fire station or expansion of the existing Station No. 81 to provide adequate fire protection service to the Project Site. As discussed previously, institutional uses, including fire and emergency facilities, have been anticipated as a part of Project Site development and the impacts of their construction and, as needed, mitigation measures and other regulatory requirements, are discussed in other sections of this EIR. As such, following measures are proposed to minimize construction-related impacts: **Mitigation Measures 4.B-2a, 4.B-2b, and 4.B-3** (construction air emissions); **Mitigation Measures 4.C-1a through 4.C-1c, Mitigation Measures 4.C-2a through 4.C-2c, and Mitigation Measures 4.C-4d and 4.C-4e** (biological resources); **Mitigation Measures 4.D-2 and 4.D-4** (archaeological resources and human remains); **Mitigation Measure 4.E-2a** (ground settlement); **Mitigation Measures 4.G-2a, 4.G-2b, 4.G-2d and 4.G-2f through 4.G-2h** (hazardous materials); **Mitigation Measures 4.J-4a and 4.J-4b** (construction period noise); and **Mitigation Measure 4.N-12** (construction circulation patterns). With implementation of the construction and operational measures proposed in other sections of this EIR, along with preparation and implementation of the Fire Protection Services Plan described above, impacts on fire protection services would be reduced to a less-than-significant level.

4.L.4 Public Schools

Environmental Setting

School Facilities and Enrollment

The Brisbane Elementary School District (Brisbane ESD), the Bayshore Elementary School District (Bayshore ESD), and the Jefferson Union High School District (JUHSD) provide grades K-12 public education to Brisbane residents. The Project Site is currently within the Bayshore ESD and JUHSD. As in many Bay Area school districts, enrollment in the school districts serving Brisbane has been in decline over the past two decades (see **Table 4.L-2**).

**TABLE 4.L-2
 SCHOOL DISTRICT ENROLLMENT TRENDS, 1996–2011**

School	15-Year Peak Enrollment ^a	2010-2011 Enrollment	15-Year Average Enrollment
Brisbane Elementary School District			
Brisbane Elementary School	229	224	213
Panorama Elementary School	280	130	202
Lipman Middle School	250	189	206
Districtwide Totals	673	543	621
Bayshore Elementary School District^b			
Bayshore Elementary School	258	214	227
Garnet J. Robertson Intermediate School	223	184	207
Districtwide Totals	462	398	434
Jefferson Union High School District^c			
Terra Nova High School (2,208 student capacity)	1,509	1,249	1,393
Oceana High School (1,472 student capacity)	802	552	675
Westmoor High School (1,600 student capacity)	1,850	1,725	1,790
Jefferson High School (2,240 student capacity)	1,562	1,196	1,316
Districtwide Totals	5,566	4,722	5,174

- ^a The numbers shown in this column identify the highest enrollment in a certain year for each school and the districts during the 15-year period of 1996-2011. The numbers are not meant to be added together.
- ^b Enrollment excludes students participating in the Kaplan Academy of California, an online high school affiliated with the Bayshore Elementary School District.
- ^c School facility capacity information is available for the Jefferson Union High School District only. Capacity estimates are based on established limit of 32 students per classroom and a 960-square-foot-per-room minimum (Cook, 2012a).

SOURCE: CDE, 2011.

Brisbane Elementary School District

The Brisbane ESD is a kindergarten through eighth grade (K-8) school district comprised of two elementary schools and one middle school with a combined enrollment of 543 students in the 2010-2011 school year (CDE, 2011).

The Brisbane ESD receives funding based on average daily attendance, called “Revenue Limit District Funding,” and generally approves inter-district transfer permits. Further, it is Brisbane ESD board policy to allow Brisbane ESD employees’ dependents to attend schools (Presta, 2012).

Facilities. The elementary school closest to the Project Site is Brisbane Elementary School located at 500 San Bruno Avenue, less than one mile from the Project Site. Panorama Elementary School, located at 25 Bellevue Avenue in Daly City, is less than two miles west of the Project Site. Lipman Middle School, located at 1 Solano Street, is also less than one mile from the Project Site. As of the publication of this EIR, the Brisbane ESD had no plans for facilities expansion.

Enrollment. Overall, Brisbane ESD enrollment has been in decline over the last several years. Since the peak enrollment of 673 students in the 2002-2003 school year, the combined enrollment for the elementary schools has declined by approximately 16 percent and the Lipman Middle School enrollment has declined by approximately 25 percent. Overall, the 15-year average enrollment for the Brisbane ESD is 621 students (CDE, 2011).

Bayshore Elementary School District

The Bayshore ESD is a K-8 school district comprised of two elementary schools serving residents in parts of Daly City and Brisbane. The Project Site lies within the boundaries of Bayshore ESD.

The Bayshore ESD receives funding solely from property taxes within its district, a funding method called “Basic Aid District Funding.” For this reason, the Bayshore ESD often limits its inter-district transfers.

Facilities. Bayshore Elementary School, a K-4 elementary school, is located at 155 Oriente Street in Daly City. It is one-half mile west of the Project Site and has a 2010-2011 student enrollment of 214 students (Bayshore ESD, 2011; CDE, 2011). Garnet J. Robertson Intermediate School, also less than one-half mile west of the Project Site at 1 Martin Street in Daly City, serves grades 5 through 8 and had a 2010-2011 school year enrollment of 184 students. As of the publication of this EIR, the Bayshore ESD had no plans for facilities expansion.

Enrollment. The combined enrollment of Bayshore Elementary School and Garnet J. Robertson Intermediate School is 398 students. Overall, the combined enrollment of the Bayshore ESD’s two school facilities has been relatively stable.⁵ However, the 2010-2011 school year enrollment was the lowest in 15 years and showed a 14-percent decline from its peak in the 1997-1998 school year. The 15-year average enrollment for the Bayshore ESD is 434 students, while, as mentioned above, the 2010-2011 school year enrollment was 398 students (CDE, 2011).

Brisbane ESD and Bayshore ESD Reorganization Study

At this time, neither the Brisbane ESD nor the Bayshore ESD is considering plans for facility expansion. However, in 2011, the Brisbane ESD and Bayshore ESD initiated a review of the potential closure of one of the Brisbane school sites along with an array of possibilities for reorganization, including unionization into a single district K-8 elementary district and unification into a single K-12 district. The study, conducted by School Services of California, Inc., was presented in March 2012 was presented to the district boards. School Services of California, Inc. concluded that, because future property taxes associated with development on the Baylands would be distributed to school agencies as required based on existing allocations, and given the long and uncertain timeline for development, the current proposals for development of the Project Site would not affect the outcome of school district reorganization. Both district boards ultimately declined to pursue consolidation.

⁵ Since the 2009-2010 school year, students enrolled in the online school, Kaplan Academy of California-San Francisco Bay, have been included in the California Department of Education’s enrollment count for the Bayshore ESD (CDE, 2011).

Jefferson Union High School District Facilities and Enrollment

Residents of the Brisbane ESD and the Bayshore ESD also are residents of the JUHSD. The JUHSD serves approximately 4,722 students in grades 9 through 12 in the cities of Daly City, Colma, Brisbane, and Pacifica.

Facilities. The JUHSD includes four high schools—Jefferson (Daly City), Westmoor (Daly City), Terra Nova (Pacifica), and Oceana (Pacifica)—in addition to the Thornton continuation high school (Daly City).

The two JUHSD schools closest to the Project Site are Jefferson High School, approximately three miles west of the Project Site at 6996 Mission Street in Daly City; and Westmoor High School, approximately four miles west of the Project Site at 131 Westmoor Avenue in Daly City.

Enrollment. Enrollment in the JUHSD has shown a relatively steady decline over the last several years. The 2010-2011 school year enrollment of 4,722 students was approximately 10 percent lower than the JUHSD's peak enrollment of 5,566 students in the 1999-2000 school year. The 15-year average enrollment for the JUHSD is 5,174 students (CDE, 2011).

Although the 2010-2011 school year enrollment in Westmoor High School showed a decline from the previous nine school years, overall enrollment numbers have varied less than eight percent over the past 15 years. The average enrollment during this time frame is approximately 1,790 students. Student enrollment currently exceeds capacity (1,600) at Westmoor High School. In contrast, Jefferson High School has shown a fairly steady trend of decline over the past 15 years, with the 2010-2011 school year enrollment representing a 23-percent drop from its peak in the 1996-1997 school year. The average enrollment in Jefferson High School over the past 15 years is approximately 1,316 students (CDE, 2011); enrollment capacity for Jefferson High School is 2,240 students (Cook, 2012).

The two JUHSD high schools that are located in Pacifica account for most of the declining enrollment in the JUHSD. Terra Nova High School, located at 1450 Terra Nova Boulevard, approximately 17 miles (road distance) from the Project Site, has experienced a nearly 17-percent enrollment decline since its peak in 2001-2002. Oceana High School, located at 401 Paloma Avenue, approximately 13 miles (road distance) from the Project Site, has experienced a nearly 31-percent enrollment decline since its peak in 1998-1999. The 15-year average enrollment for Terra Nova and Oceana High Schools is 1,393 and 675 students, respectively (CDE, 2011); enrollment capacity is 2,208 and 1,472 students, respectively.

Open Enrollment Policy. The JUHSD has a policy of open enrollment, which allows families the opportunity to choose their school of attendance, regardless of where they reside within the JUHSD's boundaries. Most Brisbane residents, upon graduation from Lipman Middle School, choose to attend Terra Nova High School or Oceana High School in Pacifica, even though the schools in Daly City are closer to Brisbane. The City of Brisbane currently provides busing service from Brisbane to these high schools (Minschew, 2012).

The JUHSD's open enrollment intra-district policy allows capacity issues to be reviewed on a district level. In addition, the JUHSD's inter-district policy is broad, and students from other districts are rarely denied JUHSD attendance permits (Minshew, 2012; Cook, 2012a).

Planned Facilities Expansions. Despite the declining enrollment trend, the JUHSD has a number of expansion projects in various stages of implementation. These include a new two-story science classroom facility at Jefferson High School, two new two-story academic buildings at Terra Nova High School, a planned science classroom and library building at Westmoor High School, and upgraded sports resources and utilities on each of the high school campuses (Cook, 2012a).

Student Generation Estimates

The California State Allocation Board (SAB) Office of Public School Construction regulates enrollment projections for the state's public school districts. The SAB defines a number of options for generating student enrollment projections and provides an approved methodology for determining the number of elementary, middle, and high school students that could be expected to live in new residential units. This methodology is based on historical student generation rates for new residential units constructed within the school district during the previous five years. Only new residential units of a type similar to those anticipated may be used as a basis for defining the student yield factor (SAB, 2009).

Neither the Brisbane ESD nor the Bayshore ESD has district-specific student generation factors. In the absence of a district-specific student generation factor, generation factors used for the San Francisco Unified School District in the Candlestick Hunters Point EIR (City and County of San Francisco, 2009), which is located adjacent to the Project Site, were applied to estimate the number of elementary and middle school students that would be generated by residential development proposed as part of the DSP and DSP-V scenarios. The generation factors employed in the Candlestick Hunters Point EIR (0.203 elementary or middle school students per dwelling unit) are appropriate for this analysis given the proximity of that project to the Project Site and the similarity between the two projects in the mix of land uses being proposed.

Student yield factors specific to new residential development within the JUHSD boundary were calculated as a part of a School Fee Facilities Plan prepared for the JUHSD in 2002 (Shilts Consultants, 2002). New single-family homes were projected to yield 0.21 high school student per dwelling unit, condominiums were projected to yield 0.08 high school student per dwelling unit, and multi-family housing units were projected to yield 0.04 high school student per dwelling unit. Because the Project (DSP and DSP-V) proposes only medium- and high-density residential units, the 0.21 student yield factor is not appropriate for this analysis. Therefore, for the purposes of this analysis, this EIR assumes a 0.08 student yield rate per dwelling unit for high school students. In this case, the 0.08 student yield factor is more appropriate as it presents a conservative approach to estimating the number of high school students generated by the Project.

As noted above, neither the Brisbane ESD nor the Bayshore ESD has district-specific student generation factors, and, while the JUHSD School Fee Facilities Plan did describe school facility costs relating to new commercial development, it did not explicitly detail student generation rates

for non-residential development. In addition, there is no statewide average student yield factor for non-residential development. Therefore, to determine a reasonable method for estimating student generation rates for non-residential land uses, research was conducted into how other California school districts have approached analysis of student generation from non-residential development. This research yielded numerous examples of fee studies that estimated student generation for non-residential development. A comparison of these studies found that the most common approach is to assume that each 1,000 square feet of new commercial or industrial development could yield up to 0.04 new students in both elementary/middle school and in high school. In the absence of existing criteria applicable to the JUHSD, this method was used in this analysis.

Regulatory Setting

State Regulations

Senate Bill 50 (School Impacts)

The Leroy F. Greene School Facilities Act of 1998, or Senate Bill 50 (SB 50), restricts the ability of local agencies, such as the City of Brisbane, to deny land use approvals on the basis that public school facilities are inadequate, and precludes local agencies from requiring more than a standard developer fee. SB 50 authorizes school districts to levy developer fees to finance the construction or reconstruction of school facilities to address local school facility needs resulting from new development. SB 50 establishes the base amount of allowable developer fees for school impacts.

In January 2012, SAB approved maximum Level 1 developer fees at \$0.51 per square foot of enclosed and covered space in any commercial or industrial development, and \$3.20 per square foot for residential development (SAB, 2012). Public school districts must submit justification to levy Level 1 developer fees and can impose higher fees than those established by the SAB, provided they meet the conditions outlined in the Leroy F. Greene School Facilities Act. Private schools are not eligible for fees collected pursuant to SB 50.

The JUHSD serves as the collection agency for its partner elementary school districts. In 2012, both the JUHSD and the Brisbane ESD had approved Level 1 fees of \$0.47 and \$2.97 per square foot of commercial/industrial and residential development, respectively. The Bayshore ESD's approved Level 1 fees are \$0.42 and \$2.63 per square foot of commercial/industrial and residential development, respectively (Fuentes, 2012; Cook, 2012b). Therefore, the JUHSD collects, from the developer, \$0.47 and \$2.97 per square foot of commercial/industrial and residential development, respectively. Of these Level 1 fees collected, the partnered elementary school district in which the development occurs would collect, from the JUHSD, 60 percent of its approved Level 1 fee. The remaining fee is retained by the JUHSD.⁶

Section 65995(h) of the Government Code, which sets forth the provisions of SB 50, states that the payment of statutory fees is "deemed to be full and complete mitigation of the impacts of any legislative or adjudicated act, or both, involving but not limited to, the planning, use, or

⁶ For example, the JUHSD would collect \$2.97 for each square foot of residential development within the Bayshore ESD. The JUHSD would then distribute \$1.58 to the Bayshore ESD (60 percent of its approved \$2.63) and keep the remaining \$1.39.

development of real property, or any change in governmental organization or reorganization...on the provision of adequate school facilities.” Although SB 50 fully mitigates direct impacts on school facilities, under CEQA, the indirect impacts related to school attendance or construction of school facilities must also be considered and mitigated in the EIR. These include indirect impacts on traffic, air quality and noise levels.

Allen Bill (Inter-District Transfer Because of Parent Employment)

California Education Code Section 48204(b) permits a school district to deem a student to have complied with the residency requirements for school attendance in the district if at least one parent or guardian of the student is physically employed within the boundaries of that district. Once admitted to residency, the student’s transfer may be revoked only if the parent ceases to be employed within the boundaries of the district.

Local Regulations

The Recreation and Community Services Element of the City of Brisbane General Plan contains the following relevant policy and programs:

Policy 103: Work collaboratively with the Brisbane School District to provide neighborhood schooling and comprehensive services for children and their families and the general public.

Program 103a: Establish a City Council subcommittee to work jointly with the Brisbane Elementary School District and the Jefferson High School District and other entities to determine the feasibility of and make recommendations regarding a high school in Brisbane.

Program 103b: Establish a City Council subcommittee to promote and encourage educational facilities to locate in Brisbane.

Program 103c: Develop a program to require impact and mitigation fees from developers, as appropriate, for constructing and/or operating a local high school.

Significance Criteria

Appendix G of CEQA Guidelines indicates that a project would have a significant effect on the environment if it were to:

- 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 provide adequate classroom space.

Impact Assessment Methodology

The environmental impact analysis for public services in this EIR involves an assessment of existing public school resources and enrollment data. The methodology included a review of data acquired from the California Department of Education and evaluation of trends over the past 15 years for which enrollment data are available. Student generation rates used to calculate the Project’s anticipated demand for public schools were acquired from the JUHSD, SAB Office of

Public School Construction, and generation factors used for the San Francisco Unified School District in the Candlestick Hunters Point EIR (City and County of San Francisco, 2009).

This analysis focuses on how new development resulting from Project Site development, could affect the demand for public schools in Brisbane and vicinity. The analysis of public services and impacts related to the need for new and/or expanded school facilities is based on the housing and non-residential development building area described in Chapter 3, *Project Description*, of this EIR.

Project Impacts and Mitigation Measures

Impact 4.L-3: Would the Project 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 provide adequate classroom space?

Impact Significance by Scenario (before Mitigation)			
DSP	DSP-V	CPP	CPP-V
SM	SM	SM	SM
SU= Significant Unavoidable SM = Significant but Mitigable LTS = Less than Significant - = no impact			

DSP and DSP-V

At projected buildout under the DSP or DSP-V scenario, approximately 4,434 multi-family residential units would be constructed. Using a combination of the applied student generation factor of 0.203 for elementary and middle school students and the JUHSD specific student yield factors (consisting of 0.08 high school student per new condominium/multi-family dwelling unit), residential development under the DSP and DSP-V scenarios would result in approximately 1,255 new students (900 elementary or middle school students and 355 high school students). In addition, at buildout under the DSP or DSP-V scenario, approximately seven million square feet of new non-residential development would be constructed. Based on the average student generation rates per 1,000 square feet of non-residential development, new non-residential development under the DSP and DSP-V scenarios could result in as many as 356 new students (178 additional JUHSD students and 178 additional elementary and middle school students in the Brisbane ESD and Bayshore ESD).⁷

The total 1,078 elementary or middle school students that would be generated by proposed development under the DSP and DSP-V scenarios would result in an increase of more than 125-percent beyond the combined current enrollment of both the Brisbane ESD and the Bayshore ESD (total 941). Total project-related generation of high school students (533) would represent an 11-percent increase in the enrollment of the JUHSD.

⁷ The calculation of the number of Project Site workers registering their children for school based on their place of employment is based on the premise that these workers do not also live within the Project Site. While it is reasonable to conclude that some Project Site workers are also residents of the Project Site, those workers would be registering their children based on their place of residence. The provisions of state law providing parents the ability to register their children for school based on their place of employment rather than residence is intended to provide an accommodation for parents who live and work in different school attendance boundaries, and to thereby justify school mitigation fees for non-residential development.

Considering the declining enrollment and the excess capacity currently available in JUHSD schools,⁸ the number of students generated by the DSP or DSP-V would not result in the need for new or expanded high school facilities beyond what is already underway and planned within the JUHSD (see Table 4.L-2). Although the maximum capacity of the schools within the elementary school districts is not available, based on comparison of Project Site development-related grade K-8 student generation (900 students from residential development and 178 students from commercial development) to the combined enrollment of both the Brisbane ESD and the Bayshore ESD, both current (941 students) and 15-year peak (1,135 students), it is evident that development under the DSP or DSP-V scenario would create a need for new grade K-8 school facilities.

Pursuant to SB 50 (see “Regulatory Setting” above), applicants for individual development projects under the DSP and DSP-V scenarios would be required to pay school facilities impact fees established to offset the impacts of new development on school facilities. Therefore, although proposed development under the DSP and DSP-V scenarios would more than double the combined current enrollment of the Brisbane ESD and the Bayshore ESD along with an 11-percent increase in the enrollment of the JUHSD, payment of fees mandated under SB 50 is the mitigation measure prescribed by the statute, and payment of such fees is the exclusive method available to the City to mitigate the direct impacts on school facilities. Further, payment of such fees is presumed under the law to be mitigation in full for direct impacts to school facilities caused by increasing student enrollment. However, CEQA requires analysis of the indirect impacts associated with construction or expansion of schools, such as an increase in student traffic, in the appropriate resource area.

The DSP and DSP-V scenarios designate two specific sites within the Icehouse District for the development of institutional uses, including an elementary school and a charter high school (see Figures 3-11 and 3-12 in Chapter 3, *Project Description*, of this EIR) (UPC, 2011). The elementary school site would be located in the northern portion of the district just south of the Roundhouse Green at the southern terminus of the proposed Promenade. The charter high school site would be located at the base of Icehouse Hill on a 5.3-acre site to be used as a shared-use recreational facility.

These facilities, which are included within the proposed institutional uses under the DSP and DSP-V, are intended to meet the increased demand for schools generated by development of the Project Site. Therefore, indirect operational impacts associated with proposed new school facilities, including increases in traffic, air quality and GHG emissions, noise, and disturbance of biological, hydrologic, and cultural resources, and increases in the demand for public services and utilities, are included in the overall analysis of Project Site development set forth in relevant sections of this EIR, for proposed development scenarios, and these impacts are mitigated as necessary.

Construction of the proposed onsite school facilities also has been anticipated as a part of the DSP and DSP-V scenarios, and the indirect impacts of their construction and, as needed, mitigation measures and other regulatory requirements, are discussed and analyzed in Section 4.B, *Air Quality*;

⁸ Three of the four high schools in the district are well below student enrollment capacities. Westmoor High School is over capacity by about 100 students, but the 2010-2011 enrollment of 1,725 is below the school’s past peak enrollment of 1,850, suggesting a decline in enrollment as well.

Section 4.C, *Biological Resources*; Section 4.E, *Geology, Soils, and Seismicity*; Section 4.F, *Greenhouse Gas Emission*; Section 4.G, *Hazards and Hazardous Materials*; Section 4.H, *Hydrology and Water Quality*; Section 4.J, *Noise and Vibration*; Section 4.N, *Traffic and Circulation*; and 4.P, *Energy*. Impacts related to school construction are similar to those associated with construction of any new structure(s), and include air quality, GHG and traffic impacts associated with the use of construction vehicles and with project operation; impacts to water quality during construction and as a result of new impermeable surfaces; noise impacts associated with construction vehicles and school operation; and impacts during construction to biological resources. Analysis of construction impacts also includes a discussion of impacts related to the appropriateness of the siting of schools as part of the Project with respect to the presence and potential for disturbance of hazards and hazardous materials (see Impact 4.G-3 in Section 4.G, *Hazards and Hazardous Materials*).

As discussed in Section 4.G, *Hazards and Hazardous Materials*, remedial actions and cleanup levels for parcels within the former landfill and railyard portions of the Project Site will be finalized with preparation of Remedial Action Plans. The Remedial Action Plans may require deed restrictions on certain uses, including schools, to limit human exposures to contaminants above levels considered protective of unrestricted use. Therefore, the results of the remediation process may also preclude construction of schools within certain areas of the Project Site.

As noted above, buildout of the DSP or DSP-V scenario could generate as many as 1,078 elementary and middle school students. Therefore, because a single K-8 school can accommodate this number, Project Site students could be accommodated within the Project Site.

Conclusion: Impacts associated with the provision of new school facilities resulting from the DSP and DSP-V scenarios would be significant. The legally required payment of school fees would mitigate direct impacts on school facilities. In terms of indirect impacts, as noted above, the construction and operation of institutional uses has been anticipated as a part of Project Site development, and the impacts of their construction and operation are discussed in other sections of this EIR. As such, the following measures are proposed to minimize indirect impacts from schools: **Mitigation Measures 4.B-2a, 4.B-2b, and 4.B-3** (construction air emissions); **Mitigation Measures 4.C-1a through 4.C-1c, Mitigation Measures 4.C-2a through 4.C-2c, and Mitigation Measures 4.C-4d and 4.C-4e** (biological resources); **Mitigation Measures 4.D-2 and 4.D-4** (archaeological resources and human remains); **Mitigation Measure 4.E-2a** (ground settlement); **Mitigation Measures 4.G-2a, 4.G-2b, 4.G-2d, and 4.G-2f through 4.G-2h** (hazardous materials); **Mitigation Measures 4.J-4a and 4.J-4b** (construction period noise); and **Mitigation Measure 4.N-12** (construction circulation patterns).

Conclusion with Mitigation: Direct impacts would be mitigated by payment of school fees and indirect on-site construction and operation-related impacts would be minimized with implementation of mitigation measures listed above. Therefore, impacts associated with new on-site school facilities under the DSP and DSP-V would be less than significant.

CPP and CPP-V

At projected buildout of the CPP or CPP-V scenario, over eight million square feet of new non-residential development would be constructed. Based on the methodology presented above (that each 1,000 square feet of new commercial or industrial development could yield up to 0.04 new student in both elementary/middle school and in high school), this development would result in as many as 658 students (329 additional JUHSD students and 329 additional elementary and middle school students in the Brisbane ESD and Bayshore ESD).

Project-development related generation of 329 high school students would represent a seven-percent increase in the enrollment of the JUHSD. Considering the declining enrollment and the excess capacity currently available in JUHSD schools, it is likely that students generated by the CPP or CPP-V would not result in the need for new or expanded high school facilities beyond what is already underway and planned within the JUHSD (see Table 4.L-2).

The 329 additional elementary or middle school students that would be generated by proposed development under the CPP and CPP-V scenarios would represent a 35-percent increase in the combined current enrollment of both the Brisbane ESD and the Bayshore ESD. Based on comparison of Project Site development-related grade K-8 student generation (329 students) to the combined enrollment of both the Brisbane ESD and the Bayshore ESD, both current enrollment (941 students) and 15-year peak enrollment (1,135 students), it is evident that development under the CPP and CPP-V would create a need for new elementary and/or middle school facilities.

As noted above, SB 50 would require that applicants for individual development projects under the CPP or CPP-V scenarios pay school facilities impact fees established to offset the direct impacts of new development on school facilities. Indirect impacts associated with the construction and operation of such facilities, such as an increase in student traffic, must be analyzed in the appropriate resource area.

The CPP and CPP-V scenarios designate an area within the Project Site for the development of institutional uses, including a charter high school site located at the base of Icehouse Hill. This proposed new charter high school is assumed to be included within the proposed institutional uses under the CPP and CPP-V scenarios. Therefore, operational impacts associated with new high school facilities, including increases in traffic, air quality and GHG emissions, noise, and disturbance of biological, hydrologic, and cultural resources, and increases in the demand for public services and utilities, are assumed as part of the overall analysis of Project Site development set forth in this EIR for proposed development scenarios.

The construction of proposed onsite school facilities also has been anticipated as a part of the CPP and CPP-V scenarios, and the impacts of their construction and, as needed, mitigation measures and other regulatory requirements, are discussed and analyzed in Section 4.B, *Air Quality*; Section 4.C, *Biological Resources*; Section 4.E, *Geology, Soils, and Seismicity*; Section 4.F, *Greenhouse Gas Emission*; Section 4.G, *Hazards and Hazardous Materials*; Section 4.H, *Hydrology and Water Quality*; Section 4.J, *Noise and Vibration*; Section 4.N, *Traffic and Circulation*; and 4.P, *Energy*. Impacts related to school construction are similar to those associated with construction of any new structure(s), and include air quality, GHG and traffic

impacts associated with the use of construction vehicles and with project operation; impacts to water quality during construction and as a result of new impermeable surfaces; noise impacts associated with construction vehicles and school operation; and impacts during construction to biological resources. Analysis of construction impacts also includes a discussion of impacts related to the appropriateness of the siting of schools as part of development of the Project Site with respect to the presence and potential for disturbance of hazards and hazardous materials (see Impact 4.G-3 in Section 4.G, *Hazards and Hazardous Materials*, of this EIR).

As discussed in Section 4.G and noted above, remedial actions and cleanup levels for parcels within the former landfill and railyard portions of the Project Site will be finalized with preparation of Remedial Action Plans. The Remedial Action Plans may require deed restrictions on certain uses, including schools, to limit human exposures to contaminants above levels considered protective of unrestricted use.

The CPP and CPP-V scenarios do not designate an area for development of an elementary or middle school. Because the CPP and CPP-V scenarios do not designate an area for development of an elementary or middle school, and because the addition of 329 elementary and middle school students under these scenarios would necessitate the addition of a school, impacts associated with new school facilities would be significant.

Conclusion: While impacts associated with new school facilities under the CPP and CPP-V would be significant. Should the CPP or CPP-V scenario be selected, reserving an elementary/middle school site to accommodate students that may be generated as the result of onsite employment and reflecting this reservation in the specific plan that would be required prior to Project Site development would avoid this impact.

Mitigation

Mitigation Measure 4.L-3: A site for an elementary/ middle school of sufficient size to accommodate development-related enrollment under the CPP and CPP-V scenarios shall be reserved as part of the specific plan required by the Brisbane General Plan for development within the Project Site.

Mitigation Measure Applicability by Scenario			
DSP	DSP-V	CPP	CPP-V
-	-	✓	✓
✓ = measure applies - = measure does not apply			

Conclusion with Mitigation: Impacts associated with the provision of new school facilities resulting from the CPP and CPP-V would be significant. The legally required payment of school fees would mitigate direct impacts on school facilities. Construction and operational related impacts would be minimized with implementation of mitigation measures proposed throughout the EIR. See **Mitigation Measures 4.B-2a, 4.B-2b, and 4.B-3** (construction air emissions); **Mitigation Measures 4.C-1a through 4.C-1c, Mitigation Measures 4.C-2a through 4.C-2c, and Mitigation Measures 4.C-4d and 4.C-4e** (biological resources); **Mitigation Measures 4.D-2 and 4.D-4** (archaeological resources and human remains); **Mitigation Measure 4.E-2a** (ground settlement); **Mitigation Measures 4.G-1a, 4.G-1b, 4.G-2a, and 4.G-2f through 4.G-2h** (hazardous materials); **Mitigation Measures 4.J-4a and 4.J-4b** (construction period noise); and **Mitigation Measure 4.N-12** (construction circulation patterns).

4.L.5 Public Libraries

Environmental Setting

There are 14 branch libraries within a 3.5-mile radius of the Project Site (see **Table 4.L-3**). These branches are affiliated with the public library systems of San Mateo County, Daly City, San Francisco, and South San Francisco. San Mateo County operates 12 community libraries in 11 cities and towns in the incorporated and unincorporated areas of San Mateo County (San Mateo County Library, 2007). The Daly City Public Library operates four branch libraries and provides services to the residents of the City of Daly City as well as the residents of Colma and unincorporated Broadmoor (Daly City Library, 2011). The City and County of San Francisco operates an extensive network of over 20 neighborhood libraries, 9 of which are in proximity to the Project Site (San Francisco Public Library, 2011). Many of the branch libraries in the San Francisco Public Library system have opened or been renovated within the last five years. The City of South San Francisco maintains one main and one branch library, each of which is in proximity to the Project Site.

Together, these libraries provide a wide range of services. Collections of fiction, nonfiction, and reference materials are geared toward children, teens, and adults and are available in English, Cantonese, Mandarin, and Spanish, among other languages. Collections include periodicals, audio books, CDs, and DVDs. Materials available to library patrons are not limited to those housed in the neighborhood branch library. Libraries may provide access to broader collections through inter-library loan, whereby patrons may request and borrow items from participating libraries, universities, and other institutions throughout North America.

In addition to their combined lending collections, these libraries offer important community services such as computer and Internet access. Community rooms and spaces within these libraries provide for a variety of services including adult lecture series, programs for children and teens, early and adult literacy programs, and teacher services.

Regulatory Setting

There are no state library service regulations applicable to the Project. The City of Brisbane General Plan does not contain policies regarding libraries that pertain to the Project.

Significance Criteria

Criteria outlined in the CEQA Guidelines were used to determine the level of significance of identified impacts on public services. Appendix G of the CEQA Guidelines indicates that a project would have a significant effect on the environment if it were to:

- 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 provide adequate library services.

**TABLE 4.L-3
 LIBRARY BRANCHES WITHIN 3.5 MILES OF THE PROJECT SITE**

Branch	Location	Distance from Project Site (miles)
Brisbane Branch San Mateo County Public Library	250 Visitacion Avenue Brisbane	0.5
Bayshore Branch Daly City Public Library	460 Martin Street Daly City	0.5
Visitacion Valley Branch San Francisco Public Library	201 Leland Avenue San Francisco	0.5
Portola Branch San Francisco Public Library	380 Bacon Street San Francisco	1
Bayview Branch San Francisco Public Library	2057 3rd Street San Francisco	2
Grand Avenue Branch South San Francisco Public Library	306 Walnut Avenue South San Francisco	2
Bernal Heights Branch San Francisco Public Library	500 Cortland Avenue San Francisco	2.5
Excelsior Branch San Francisco Public Library	4400 Mission Street San Francisco	2.5
Glen Park Branch San Francisco Public Library	2825 Diamond Street San Francisco	2.5
Main Library South San Francisco Public Library	840 West Orange Avenue South San Francisco	3
Ingleside Branch San Francisco Public Library	1298 Ocean Avenue San Francisco	3.5
Mission Branch San Francisco Public Library	300 Bartlett Street San Francisco	3.5
Ocean View Branch San Francisco Public Library	345 Randolph Street San Francisco	3.5
John Daly Branch Daly City Public Library	134 Hillside Boulevard Daly City	3.5

SOURCE: ESA, 2011.

Impact Assessment Methodology

The environmental impact analysis for public services in this EIR involves an assessment of available public libraries in proximity to the Project Site. The methodology included a review of the types of services provided by these libraries and the methods used to deliver services to the public.

Project Impacts and Mitigation Measures

Impact 4.L-4: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to provide adequate library services?

Impact Significance by Scenario (before Mitigation)			
DSP	DSP-V	CPP	CPP-V
SM	SM	LTS	LTS
SU = Significant Unavoidable SM = Significant but Mitigable LTS = Less than Significant - = no impact			

DSP, DSP-V, CPP, and CPP-V

Project Site development would increase population on the Project Site and increase the use of library space in the surrounding area.

At buildout under the DSP or DSP-V scenario, approximately 9,888 residents would be introduced to the Project Site (see Table 4.K-12 in Section 4.K, *Population and Housing*, of this EIR), along with the students discussed in Section 4.L.4, *Public Schools*. The permanent resident and student population would result in an increased demand for library services. Project Site development-related demand would increase over time throughout the buildout of the Project Site, as specific development projects are constructed and occupied.

Under the CPP or CPP-V scenario, no residential units would be constructed; therefore, the resident population at the Project Site would not increase and the Project Site development-related demand for library services would be substantially lower than that of the DSP or DSP-V scenario, resulting from Project Site students registered for school based on their parents' place of employment, which would generate some increased demand for library services.

Although demand for library resources would increase under all four development scenarios, the development of inter-library loan programs increasingly allows libraries to distribute resources to their constituents with reduced reliance on the physical library facility to store a large collection. As such, adequate provision of library services cannot be evaluated by measuring the collection size within a specific branch against the number of registered borrowers or per capita. The Project Site development-related population increase would also result in an increased demand on the community rooms, study areas, and designated community spaces that existing libraries provide. The increase in demand for library services would be expected to take place over time throughout the Project Site development period with the incremental addition and occupancy of new building space (residential and non-residential).

Given the 14 existing branch libraries within 3.5 miles of the Project Site, including three libraries within one-half mile of the Project Site, and given the increased availability of electronic materials and materials through inter-library loans, it is reasonable to anticipate that, in the absence of a library facility within the Project Site, area residents, students, and employees would tend to use other nearby library facilities, impacting the capacity of those facilities. Thus, development of the Project Site under the DSP and DSP-V development scenarios would result in a need for library space beyond what already exists to maintain existing services to the Brisbane community and not impact libraries in surrounding communities.

Conclusion: Implementation of Project Site development would require expansion of library space in all four scenarios so as to avoid impacting the capacity of existing facilities. Because the increase in use of libraries would primarily result from proposed residential development in the DSP and DSP-V scenarios, significant environmental effects related to the provision of library services would occur in the DSP and DSP-V scenarios and require mitigation. This impact would be less than significant for the CPP and CPP-V scenarios which do not propose residential development, and no mitigation would be required for those scenarios.

Mitigation

Mitigation Measure 4.L-4: To avoid existing and proposed library facilities in surrounding communities, a library facility shall be developed within the Project Site that is of sufficient size to serve Project Site population. The onsite library shall be constructed and operational prior to issuance of the occupancy permits for more than 50 percent of the residential dwelling units permitted under the DSP and DSP-V scenarios, thereby ensuring an onsite resident population to use onsite library facilities at the time of its opening. This requirement shall be reflected in the specific plan(s) required to be prepared and approved prior to Project Site development.

Mitigation Measure Applicability by Scenario			
DSP	DSP-V	CPP	CPP-V
✓	✓	-	-
✓ = measure applies - = measure does not apply			

Conclusion with Mitigation: Provision of an adequately sized library facility within the Project Site would mitigate direct impacts of the DSP and DSP-V, and the CPP and CPP-V are not expected to impact library facilities. Therefore, impacts associated with library facilities would be less than significant.

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