

L. PUBLIC SERVICES

Section 4.L, Public Services, discusses the topics of police protection, fire protection and emergency medical services, public school facilities, and public libraries. The Environmental Setting discussion describes the existing baseline conditions for these public services. The Impacts and Mitigation Measures discussion addresses the changes in demand for these services and facilities that would occur if the Proposed Project is implemented, and whether new or expanded services would be needed as a result. The Impacts discussion also considers whether the Proposed Project in combination with other reasonably foreseeable development projects would contribute to cumulative environmental impacts related to public services.

Data used in this section include written reports and interviews/survey responses obtained from the San Francisco Police Department (SFPD) and the San Francisco Fire Department (SFFD), and reports from the San Francisco Unified School District (SFUSD), the San Francisco Public Library, and the City Controller.

The topic of public recreation and park facilities serving the project site is discussed in Section 4.J, Recreation, pp. 4.J.1-4.J.15.

ENVIRONMENTAL SETTING

POLICE

The SFPD, headquartered in the Public Safety Building at 1245 Third Street, provides public safety services in the City and County of San Francisco. SFPD services include responding to calls for police assistance, monitoring and managing traffic, and performing general surveillance duties. The SFPD consists of the Golden Gate and Metro divisions and the Operations, Special Operations, and Administration bureaus. The Golden Gate and Metro divisions contain ten separate districts that cover the City.

Staffing

The SFPD does not have an adopted standard for the ratio of officers to population or developed acreage, and bases its staffing levels on the number of service calls and crime incidents. In 2014, the SFPD averaged approximately 1,691 sworn officers out of a total of approximately

1,971 authorized sworn positions.^{1,2} Recent lower staffing levels are due to retirements. In 2012, the SFPD initiated a six-year hiring plan to gradually increase the number of SFPD officers (with an average of 50 new hires per year planned from three recruit academies). The staffing-level goal is expected to be reached in mid-2018.³

Police Response

Citywide

The type of police response varies according to the nature and urgency of the call. The SFPD has established the following four call priorities:

- Priority A – Calls involving a life-threatening emergency. These calls are the highest priority.
- Priority B – Calls involving potential for harm to life and/or property. These calls are the second highest priority.
- Priority C – Calls involving crime committed with no threat to life or property, and the suspect has left the crime scene. These calls are third highest priority.
- Priority I – Calls that are information only broadcast, e.g., public disturbance. The caller wants to remain anonymous.⁴

In 2013, the violent and property crime rates in the City were 9.63 and 55.92 incidents per 1,000 residents, respectively. The average Citywide crime rate was 65.54 incidents per 1,000 residents. Violent crime increased by 11 percent and property crime increased by 13 percent compared to 2012 rates.⁵

Project Site

The project site is within the SFPD's Bayview Police District, which is part of the Metro Division and headquartered at 201 Williams Avenue, approximately 2 miles south of the project site. (See

¹ San Francisco City Charter Section 4.127 states that the City is to maintain a staffing level of a minimum of 1,971 sworn officers, excluding officers at San Francisco International Airport, and officers not available for field duty (e.g., due to on-duty injuries, temporary modified duty, medical leave, and administrative leave).

² San Francisco Police Department (SFPD), *Annual Report 2014*, p. 34. Available online at <https://www.dropbox.com/s/mpfjb7eoy54vsrb/2014%20Annual%20Report.pdf?dl=0>. Accessed December 2, 2015. The 2014 SFPD Annual Report is the most recent data source.

³ SFPD, *Annual Report 2014*, p. 34.

⁴ San Francisco Legislative Analyst, Crime Report Systems (File No. 031412), February 24, 2004. Available online at <http://sfbos.org/crime-reporting-systems-file-no-031412>. Accessed September 26, 2016.

⁵ SFPD, CompStat, December 2013. Available online at <http://www.sf-police.org/Modules/ShowDocument.aspx?documentid=27342>. Accessed September 22, 2015.

Figure 4.L.1: Police Stations, Fire Stations, Schools, and Libraries in the Project Vicinity.) By area served, the Bayview Police District is the largest of the City's ten police districts (approximately 20 percent of the land mass in the City), and covers the southeastern part of the City, extending along the eastern edge of McClaren Park to San Francisco Bay and south from Channel Street to the San Mateo County line.⁶ It includes the Dogpatch, Potrero Hill, Bayview, Silver Terrace, Portola, and Hunters Point neighborhoods. The Bayview Police District has a population of approximately 80,000 people and covers an area with predominantly mixed-use commercial and residential developments.

Personnel include district command staff, administrative officers, and patrol officers. SFPD officers from this police district respond to calls on the project site. Currently, the Port of San Francisco contracts with the SFPD to provide two additional officers who respond to the calls for service at the project site.⁷

In 2013, the Bayview Police District received 983 calls for crimes against persons and 3,373 calls for property crimes, for a total of 4,356 calls.⁸ From 2008 to 2013, the district handled 8.7 percent of all Citywide calls and 9.9 percent of the incidents.⁹

In 2013, the reported Bayview Police District violent and property crime rates were 12.41 and 42.97 incidents per 1,000 residents, respectively. The violent crime rate is slightly higher than the Citywide average and the property crime rate is lower. The average reported crime rate for the district is about 55.39 incidents per 1,000 residents per month.¹⁰ Compared to 2012, the Bayview Police District reported violent crime and property crime rates were higher by 8 and 10 percent, respectively.¹¹ The recent reported increase in crime in the Bayview Police District is similar to the rise Citywide.

⁶ SFPD, *Annual Report 2014*, p. 65.

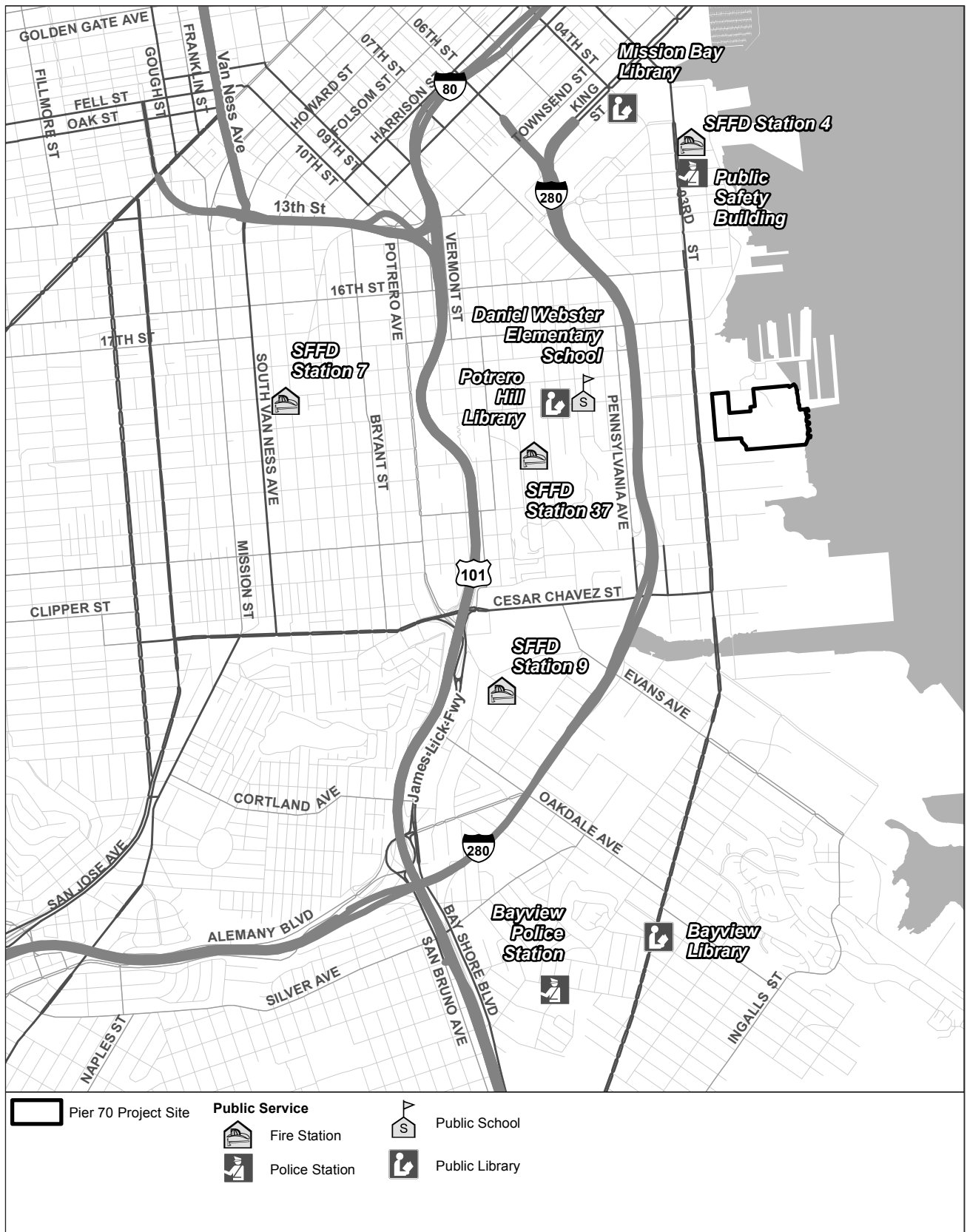
⁷ City and County of San Francisco, *Pier 70 Waterfront Site and Illinois Street Parcel Development Projects Findings of Fiscal Responsibility*, May 21, 2013, p. 28.

⁸ SFPD, *Annual Report 2013*, pp. 102-103. Available online at <https://dl.dropboxusercontent.com/u/76892345/Annual%20Reports/2013%20Annual%20Report.pdf>. Accessed December 2, 2015.

⁹ City and County of San Francisco – Controller's Office, *District Station Boundary Analysis Report*, March 3, 2015 (hereinafter referred to as "*Boundary Analysis Report*"), p. 27. Available online at <http://sfcontroller.org/Modules/ShowDocument.aspx?documentid=6273>. Accessed September 14, 2015.

¹⁰ SFPD, CompStat, December 2013. Available online at <http://www.sf-police.org/Modules/ShowDocument.aspx?documentid=27342>. Accessed September 22, 2015.

¹¹ SFPD, CompStat, December 2013. Available online at <http://www.sf-police.org/Modules/ShowDocument.aspx?documentid=27342>. Accessed September 22, 2015.



Source: City and County of San Francisco (2015)



PIER 70 MIXED-USE DISTRICT PROJECT

FIGURE 4.L.1: POLICE STATIONS, FIRE STATIONS, SCHOOLS, AND LIBRARIES IN THE PROJECT VICINITY

In 2015, the SFPD released the *District Station Boundary Analysis*, which analyzes police district boundary lines in the City.¹² This analysis was undertaken for reasons that include the construction of the new Southern District Police Station, located within the footprint of the current Bayview Police District; anticipated residential, commercial, and transportation developments that would affect the eastern and southern areas of the City; and an imbalanced workload among police districts and sectors due to varying demands for service within the patrol division.¹³ As a result of the *District Station Boundary Analysis*, the Bayview Police District's proposed service area will be reduced in order to keep the new Southern District station within the Southern District boundary. The proposed line changes would result in a reduction in demand for Bayview Police District resources.¹⁴

FIRE AND EMERGENCY MEDICAL SERVICES

The SFFD, headquartered at 698 Second Street, is responsible for protecting life and property throughout San Francisco from fires, natural disasters, and hazardous materials incidents.¹⁵ The SFFD also provides emergency medical services and transport in the City, including basic life support (BLS) and advanced life support (ALS) services. It is made up of six divisions: Administration, Fire Investigation, Operations (Fire Suppression and Emergency Medical Services), Fire Prevention, Support Services, and Training. In addition, several privately operated ambulance companies are authorized to provide BLS and ALS services within the City.

SFFD firefighting companies are organized into three divisions: the Airport Division, which serves San Francisco International Airport,¹⁶ and Divisions 2 and 3, which serve the rest of San Francisco. Division 2 is divided into four battalions (Battalions 1, 4, 7, and 8) and extends from downtown San Francisco and the Financial District to the City's northwestern boundaries. Division 3 is divided into five battalions (Battalions 2, 3, 6, 9, and 10) that serve an area extending from Market Street to the southeastern City limits. Division 2 and 3 staff responsibilities include establishing command and control at emergency scenes; conducting fire suppression activities; providing emergency medical services; managing disaster operations; mitigating the effects of hazardous materials spills; responding to incidents involving weapons of mass destruction; and bringing closure to mass-casualty incidents effectively and rapidly. Their fire prevention responsibilities include planning and inspecting buildings, fire protection devices, and water supplies used for firefighting. The SFFD ensures fire safety and emergency

¹² City and County of San Francisco – Controller's Office, *Boundary Analysis Report*, p. 1.

¹³ City and County of San Francisco – Controller's Office, *Boundary Analysis Report*, p. 27.

¹⁴ City and County of San Francisco – Controller's Office, *Boundary Analysis Report*, pp. 4-5.

¹⁵ San Francisco Fire Department, Annual Report: FY 2012-2013, p. 3. Available online at <http://www.sf-fire.org/modules/showdocument.aspx?documentid=3584>. Accessed September 14, 2015.

¹⁶ The Airport Division is composed of three firefighting companies located at San Francisco International Airport.

accessibility in new and existing developments by reviewing plans and inspecting buildings to determine their compliance with provisions of the building and fire codes.¹⁷

Staffing

As of 2013, the SFFD has approximately 1,392 uniformed and 57 civilian members.^{18,19} The U.S. Census Bureau's 2013 American Community Survey estimates that the City's total population is 817,501 residents.²⁰ Therefore, the ratio of uniformed fire personnel to residents is approximately 1.7 to 1,000 persons. Although the SFFD does not have a fire-personnel-to-residents ratio goal, the existing ratio is used as a baseline for comparison. The SFFD has 43 engine companies, 19 truck companies, 43 dynamically deployed ambulances,²¹ 2 heavy rescue squad units, 2 fireboats, and 19 special purpose units. There are currently 44 permanently staffed fire stations located strategically throughout the City, 3 stations at San Francisco International Airport, and 1 station, Fire Station 49, that houses emergency vehicles and supplies. Although the SFFD system has evolved over the years to respond to the City's changing needs, the current station configuration has not changed substantially since the 1970s.²²

Staffing at each station is based on the station's types of firefighting equipment. Based on the Memorandum of Understanding between the City and County of San Francisco and the San Francisco Fire Fighters Union Local 798, engines²³ are staffed with one officer and three firefighters, all of whom are trained emergency medical technicians (EMTs); rescue squads are

¹⁷ San Francisco Fire Department, About SFFD Operations. Available online at <http://www.sf-fire.org/index.aspx?page=164>. Accessed September 14, 2015.

¹⁸ San Francisco Fire Department, Annual Report: FY 2012-2013, p. 8. Available online at <http://www.sf-fire.org/modules/showdocument.aspx?documentid=3584>. Accessed September 14, 2015.

¹⁹ The 2012-2013 SFFD Annual Report is the most recent data source.

²⁰ U.S. Census Bureau, 2009-2013 5-Year American Community Survey, San Francisco County, American Community Survey Demographic and Housing Estimates. Available online at http://factfinder.census.gov/rest/dnldController/deliver?_ts=461008993623. Accessed September 22, 2015.

²¹ The San Francisco Administrative Code requires that the SFFD maintain four ambulances "statically deployed" at fire stations. In 2009 the SFFD completed conversion to a "dynamic" deployment model designed to enhance scheduling, increase efficiency, and improve response times by stationing four ambulances at locations throughout the City rather than at "static" fixed locations. Dynamic deployment refers to the ambulance dispatch strategy of estimating demands and stationing ambulances accordingly to increase their mobility and ensure the fastest response times. Since 2009, all City ambulances have been dynamically deployed out of Fire Station 49, located at 1415 Evans Avenue at Mendell Street in the southwestern portion of the City.

²² San Francisco Fire Department, Annual Report: FY 2012-2013, p. 8.

²³ Engines carry water and hose to extinguish fires, as well as medical equipment and defibrillators. They are the first responders to Code 3 medical calls. An engine can be an ALS or BLS engine depending on the availability of a paramedic. If a firefighter/paramedic is not available, the position is taken by a firefighter EMT.

staffed with one officer and three firefighters; and trucks²⁴ are staffed with one officer (lieutenant or captain) and four firefighters.²⁵ On an ALS engine, one of the firefighters is a firefighter/paramedic, with a significantly higher level of medical training than an EMT. Ambulances are staffed with an EMT and a paramedic who provide pre-hospital advanced medical and trauma care. The number of engines, trucks, and ambulances on duty at any time is based on staffing availability.

Fire and Emergency Medical Response

Citywide

The SFFD's response system includes provisions for the department to handle multiple, simultaneous emergencies within a primary response area.²⁶ Incident calls and responses are coded, and the SFFD has a protocol and order in which stations are called to respond, depending on the type of incident and whether vehicles or equipment are in use at another location.²⁷

The SFFD responds to two types of calls. Code 2 calls are non-life-threatening fire and medical emergencies, and Code 3 calls are life-threatening fire and medical emergencies, the highest response priority. When responding to Code 3 calls, responding vehicles use flashing lights and sirens and cross intersections against control lights. Responses to Code 2 calls are dispatched without lights and sirens. In San Francisco, response times are calculated from the time the dispatch is received and acknowledged at the station to the time the responding unit informs dispatch that it is at the scene.

The National Fire Protection Association (NFPA) has established time standards for fire and medical responses. NFPA Standard 1710 defines response time goals for various stages of response to an emergency incident. The time standard for fire and medical responses is defined as the turn-out time (the time from acknowledgement of a call to beginning of travel) plus travel time. While NFPA Standard 1710 is not a legal requirement, it provides a standardized guideline

²⁴ Trucks carry ladders and other equipment and are used in fire suppression to provide ladder access, rescue, and ventilation.

²⁵ Memorandum of Understanding between the City and County of San Francisco and San Francisco Fire Fighters Union Local 798, International Association of Fire Fighters, American Federation of Labor-Congress of Industrial Organizations, July 1, 2007 to June 30, 2018, Unit 1, Revised per Amendment #6, p. 29. Available online at <http://sfdhr.org/index.aspx?page=54>. Accessed September 22, 2015.

²⁶ Each fire station has an area of responsibility (or primary response area) for which it is typically the first responder to emergency calls. This means that the assigned fire station and its personnel and firefighting apparatus (unless out on another call) will be dispatched first to a call within their primary response area. These primary response areas have been designed so as to optimize response times.

²⁷ An incident is a specific event to which one or more fire stations or fire vehicles respond. Responses include each vehicle that is dispatched to the incident. Therefore, for one incident (depending on type), there could be two or more responses.

followed by many cities across the country, including San Francisco. The NFPA standards are as follows:

- For fire incident responses: 5 minutes for first engine on the scene with a turnout time of up to 80 seconds plus travel time of 4 minutes or less.
- For emergency medical responses:
 - BLS services: 5 minutes with a turnout time of 60 seconds plus travel time of 4 minutes or less.
 - ALS services: 8 minutes with a turnout time of 60 seconds plus travel time of 8 minutes or less.

The SFFD target response time goal is 20 minutes for Code 2 calls 90 percent of the time. For Code 3 calls the SFFD target response time goal is 4 minutes and 30 seconds 90 percent of the time for first responders capable of performing BLS, 7 minutes 90 percent of the time for responders capable of performing ALS, and 10 minutes for an ambulance to arrive on the scene.²⁸ The average response time throughout the City for Code 3 calls is 4 minutes and 40 seconds, indicating that SFFD is meeting its target response goals for first responders on scene.²⁹ However, the SFFD is currently not meeting the average or 90th percentile standard³⁰ for ambulance transport (i.e., ambulances arriving on scene).³¹ In August 2014, the City formed an Ambulance Working Group, headed by the Mayor's Office, with representatives from the SFFD, the Department of Emergency Management, the City Controller, the Board of Supervisors, the Fire Commission, and other relevant stakeholders. The working group was tasked with analyzing the issues facing the City's Emergency Medical Services (EMS) system and developing recommendations to meet response times, among other goals. Recommendations identified by the Ambulance Working Group have been implemented, including augmenting staffing and the number of ambulances in the fleet, and response times have improved. The average response times for ambulance transport in response to Code 3 calls have decreased from 8.26 minutes to

²⁸ San Francisco Department of Emergency Management, San Francisco EMS Agency Policy Manual, Section 4: Response and Transportation, Policy Reference No. 4000, November 1, 2015, pp. 5-8. Available online at <http://www.sfdem.org/index.aspx?page=165>. Accessed November 25, 2015.

²⁹ Fire Commission Response to Grand Jury Report, August 12, 2004. Available online at <http://www.sf-fire.org/index.aspx?page=827>. Accessed September 14, 2015.

³⁰ "90th percentile" means that in nine out of ten responses, the responding vehicle arrives within the required time. This is a national statistical methodology utilized by Emergency Response Agencies to measure and compare emergency response times.

³¹ City and County of San Francisco Civil Grand Jury Report, 2014-2015, San Francisco Fire Department *What Does the Future Hold?*, June 2015, p. 9. Available online at http://civilgrandjury.sfgov.org/2014_2015/14-15_CGJ_Report_SFFD_What_Does_the_Future_Hold_%207_16_15v2.pdf. Accessed November 25, 2015.

6.72 minutes, while the 90th percentile response times have decreased from 14.63 minutes to 10.82 minutes (the City's goal for Code 3 ambulance transport is 10 minutes).³²

Between July 1, 2012 and June 30, 2013, the SFFD received 120,536 calls for service within the City. Of these incidents, the majority (77 percent, or 92,255 calls) required a response by EMS personnel and 23 percent (or 28,281 calls) required a response by fire personnel.³³ Because EMS calls make up the majority of all calls, most of the work of the SFFD's Fire Suppression Division consists of emergency medical response.

Project Site

The project site is located within the SFFD's Division 3 service area, which extends from approximately Market Street to the southeastern border of the City. San Francisco International Airport, Treasure Island/Yerba Buena Island, and the Hunters Point Naval Shipyard also fall within its operational jurisdiction. The Division 3 service area encompasses all types of residential and commercial buildings, including high-rise buildings, underground construction, wood-frame residential structures in densely populated neighborhoods, and the City's only heavy concentration of industrial uses. In addition, the responsibilities of Division 3 include the main transportation facilities in the City (BART [Bay Area Rapid Transit], San Francisco International Airport, Muni) and an extended area of Port of San Francisco facilities. The oversight of these areas requires SFFD staff to have a wide variety of specialized training with the agencies that oversee these facilities. The Port of San Francisco Fire Marshal is the SFFD's liaison to the Port and conducts construction and referral inspections, plan review, and pier surveys, as well as issuing permits along the Port's 7.5 miles of waterfront jurisdiction.³⁴

The project site is within Battalion 10 and in the first response area for Fire Station No. 37.³⁵ Fire Station No. 37 is located in the Potrero Hill neighborhood at 798 Wisconsin Street, approximately 0.75 mile west of the project site. It houses one engine company (designated as a BLS engine company) and is staffed by one officer and three firefighters, all of whom are EMT qualified.³⁶ In addition to Fire Station No. 37, Battalion 10 includes the following fire stations:

³² Ibid and Office of the Mayor, Memorandum to Mayor Lee from Kate Howard, Mayor's Budget Director, re: Ambulance Working Group Conclusion, February 23, 2015. Available online at http://civilgrandjury.sfgov.org/2014_2015/14-15_CGJ_Report_SFFD_What_Does_the_Future_Hold_%207_16_15v2.pdf. Accessed November 25, 2015.

³³ San Francisco Fire Department, Annual Report: FY 2012-2013, p. 6. Available online at <http://www.sf-fire.org/modules/showdocument.aspx?documentid=3584>. Accessed September 14, 2015.

³⁴ City and County of San Francisco Fire Department, About Division. Available online at <http://sf-fire.org/about-division>. Accessed September 14, 2015.

³⁵ The first alarm area is the geographic area in which a station is responsible for arriving first in case of an emergency call.

³⁶ E-mail communication with Rhab Boughn, Public Records Officer, SFFD, October 27, 2015.

- Fire Station No. 4, at 449 Mission Rock Street at Third Street, approximately 1.5 miles north of the project site. Fire Station No. 4 became operational in April 2015 and is located in the newly constructed Public Safety Building in Mission Bay. The station houses one engine company (designated as an ALS engine company) and one truck company, and is staffed by nine personnel per shift, all of whom are EMT qualified.
- Fire Station No. 9, at 2245 Jerrold Avenue at Upton Street, approximately 2 miles southwest of the project site. The station houses one engine company (designated as an ALS engine company) and one truck company, and is staffed by 10 personnel per shift, including a firefighter/paramedic and a Battalion Chief.
- Fire Station No. 17, at 1295 Shafter Avenue at Ingalls Street, approximately 2.2 miles south of the project site. The station houses one engine company, one truck company, and a Fire Hose Tender,³⁷ and is staffed by nine personnel per shift.
- Fire Station No. 25, at 3305 Third Street at Cargo Way, approximately 1 mile south of the project site. The station houses one engine company (designated as a BLS engine company),³⁸ a Multi-Casualty Unit,³⁹ and a Mini Pumper,⁴⁰ and is staffed by four personnel per shift, all of whom are EMT qualified.
- Fire Station No. 42, at 2430 San Bruno Avenue at Silver Avenue, approximately 2.5 miles south of the project site. The station houses one engine company and an Attack Hose Tender⁴¹ and is staffed by four personnel per shift.

Fire Station Nos. 4 and 25 overlap with Fire Station No. 37's primary response area, and fire-fighting resources from these fire stations would be available upon request.

The following fire stations, located within 2 miles of the project site, would also provide fire-fighting resources upon request:

- Fire Station No. 7 (Battalion 6), at 2300 Folsom Street at 19th Street. The station houses one engine company (designated as an ALS engine company), one truck company, a heavy rescue squad unit, and a light rescue unit with a trailer. Its staff include personnel who are qualified as either EMTs or paramedics.
- Fire Station No. 8 (Battalion 3), at 36 Bluxome Street (between Fourth and Fifth streets). The station houses one engine company (designated as an ALS engine company) and one truck company. Its staff includes a Battalion Chief, two officers, and seven firefighters, all of whom are qualified as EMTs or paramedics.

³⁷ The Hose Tender provides an above-ground portable water supply system. This system can be strategically placed to provide adequate flow and pressure for firefighting when other sources of water supply fail or are not available.

³⁸ In January 2016 this engine will be designated as an ALS engine.

³⁹ The Multi-Casualty Unit was purchased with Homeland Security funds and is considered a regional response vehicle. The unit has the capability to manage up to 150 patients.

⁴⁰ Mini Pumpers respond to grass/brush fires. It is a Type 4 Engine with pump and roll capacity.

⁴¹ The Attack Hose Tender provides a platform for transporting foam concentrate and related equipment for use as a suppression agent. It also provides an above-ground master stream appliance.

- Fire Station No. 29 (Battalion 2), at 299 Vermont Street. The station houses one engine company (designated as an ALS engine company). Its staff includes one officer and three firefighters, all of whom are qualified as EMTs or paramedics.

Between September 2014 and September 2015, Fire Station No. 37 responded to 1,091 Code 2 and 3 calls (189 and 902, respectively), which is an average of about three responses per day.⁴² Fire Station No. 4 responded to 1,401 Code 2 and 3 calls (608 and 793, respectively), and Fire Station No. 25 responded to 3,897 Code 2 and 3 calls (1,500 and 2,397, respectively) during the same period.⁴³ Travel times between the project site and Fire Station Nos. 25 and 37 are under 3 minutes and 4 minutes, respectively, with travel assumed to take place along Wisconsin and 20th streets during weekday PM peak hour, travelling at posted speed limits, and obeying all traffic controls, which would be a conservative time estimate since emergency vehicles are able to travel without the same restrictions as an ordinary vehicle. For Fire Station No. 37, the average response time for Code 3 calls is 3 minutes and 54 seconds, which meets the City's target response goal for first on the scene.⁴⁴ For Fire Station Nos. 4 and 25, the average response times for Code 3 calls are 4 minutes and 16 seconds, and 3 minutes and 54 seconds, respectively.⁴⁵ Both fire stations meet the City's target response goal.

Water Supply for Fire Suppression

Citywide

Water for fire suppression in San Francisco is provided mainly from the potable water supply used for domestic and industrial water needs and managed by the San Francisco Public Utilities Commission (SFPUC).⁴⁶ The SFPUC provides fresh water for the SFFD's system of low-pressure hydrants as well as the high-elevation storage reservoir and tanks that feed the Auxiliary Water Supply System (AWSS). The AWSS, also known as the San Francisco Fire Department High Pressure System, is a gravity-fed system of water mains and 1,889 high-pressure fire hydrants that was built in 1913 solely for the purpose of firefighting.⁴⁷ The AWSS consists of a 135-mile pipeline network, a high-elevation storage reservoir with two large-capacity tanks, two pumping stations, fireboats, underground water storage tanks (cisterns), and San Francisco Bay water intakes (suction connections). The AWSS is divided into three zones to control water flow

⁴² E-mail communication with Rhab Boughn, Public Records Officer, SFFD, December 23, 2015.

⁴³ E-mail communication with Rhab Boughn, Public Records Officer, SFFD, December 23, 2015.

⁴⁴ E-mail communication with Rhab Boughn, Public Records Officer, SFFD, December 23, 2015.

⁴⁵ E-mail communication with Rhab Boughn, Public Records Officer, SFFD, December 23, 2015.

⁴⁶ City and County of San Francisco Fire Department, Water Supply Systems. Available online at <http://sf-fire.org/water-supply-systems>. Accessed September 14, 2015.

⁴⁷ In the event the gravitational fresh water supply should fail, two pumping stations, located on the Bay Shore can, at a moment's notice, begin pumping salt water into the AWSS. There are five manifolds along the Bay to allow the SFFD fireboats to augment the system with bay water.

in the event of major damage to the SFPUC's distribution system. The AWSS incorporates the use of gate valves, which are placed at frequent intervals throughout the zones, so that a damaged section of the pipeline may be isolated and shut off separately, leaving the remainder of the AWSS operational during emergency. In the event of major damage to the SFPUC's distribution system and to the AWSS, the SFFD also has access to a system of underground cisterns with a total storage capacity of approximately 11 million gallons of water. This system consists of 172 cisterns strategically located throughout the City. However, SFFD cisterns have no connection to either the SFPUC water distribution network or the AWSS.⁴⁸ In addition to SFFD cisterns, practically all private and public water storage is available to the SFFD for emergency use. The SFPUC is responsible for the City's water supply and for the storage and distribution of water within the City. The SFFD is responsible for the location of all SFFD hydrants, as well as their maintenance and development; however, since May 2010, the SFPUC has been responsible for the service, maintenance, and improvement of the AWSS.⁴⁹

Project Site

The AWSS does not extend into the project site; however, an existing AWSS water line extends along Third Street, west of the project site. There are also existing fire hydrants on the 28-Acre Site near Buildings 11 and 21. The SFFD fire boats, the *Phoenix* and the *Guardian*, can make connections directly into the AWSS via five special manifolds installed along the San Francisco Bay shoreline to serve as a back-up to the City's landside saltwater pumping stations. The nearest SFFD fire boat manifolds to the project site are at Islais Creek/Third Street to the south (approximately 1,000 feet south of the project site) and at Pier 22½ to the north.

PUBLIC SCHOOLS

The Environmental Setting and Impacts sections for the public schools discussion do not include information or analysis regarding private schools.

The San Francisco Unified School District (SFUSD) provides primary and secondary public education in San Francisco. The SFUSD manages 15 early education schools, 72 elementary schools (K-5), 12 middle schools (grades 6-8), 15 high schools (grades 9-12), 4 County and Court schools,⁵⁰ 13 charter schools, and 3 continuation/alternatively-configured schools with a total

⁴⁸ The cisterns are regularly inspected by the SFFD and are kept full by the SFPUC.

⁴⁹ In May 2010, the City and County of San Francisco Board of Supervisors and the Mayor approved the transfer of costs of operating, maintaining and improving the AWSS from the SFFD to the SFPUC.

⁵⁰ The County and Court school system educates children in the juvenile justice system.

enrollment of more than 53,000 students.⁵¹ According to the 2013 American Community Survey, there are approximately 86,437 school-aged children in San Francisco.⁵² In 2013, approximately 29.7 percent of students attended private school, 63.7 percent attended public school, and 6.6 percent of school-aged children are not enrolled in school.⁵³ Over the past five years, public elementary school student enrollment in the SFUSD has increased from approximately 21,663 to 23,047, while middle school and high school enrollment has decreased. Overall public school student enrollment between the 2009-2010 and 2014-2015 academic years has increased slightly from 55,240 to approximately 56,544.⁵⁴ The SFUSD projects its overall enrollment will increase slightly through 2016, with the largest increases projected for the elementary and middle school level and a slight increase projected for the high school level.⁵⁵

As the SFUSD is not currently experiencing high growth rates, facilities throughout the City and County are generally underutilized. The SFUSD maintains a property and building portfolio that has a student capacity for over 90,000 students. As such, the SFUSD currently has more classrooms district-wide than it needs, resulting in a surplus of property.^{56,57} The SFUSD has responded to this trend by closing and merging certain schools, and is not planning to construct new schools near the project site.

Students are assigned to elementary schools through a choice process designed to provide equitable access to the range of opportunities in the schools. Students are placed in the schools that correspond to their highest ranked request as long as there are openings. If there are more

⁵¹ San Francisco Unified School District (SFUSD), SFUSD's 2013-15 Strategic Plan. Available online at <http://www.sfusd.edu/en/assets/sfusd-staff/about-SFUSD/files/SFUSD%20Strategic%20Plan.pdf>. Accessed September 14, 2015.

⁵² U.S. Census Bureau, 2009-2013 5-Year American Community Survey, San Francisco County, California, Children Characteristics. Available at <http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>. Accessed September 14, 2015.

⁵³ U.S. Census Bureau, 2009-2013 5-Year American Community Survey, San Francisco County, California, Children Characteristics. Available online at <http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>. Accessed September 17, 2015.

⁵⁴ SFUSD, Research Planning and Accountability Data Center, School List and Summary – Student Enrollment. Available online at [http://web.sfusd.edu/Services/research_public/rpa_student_enrollment/SFUSD%20School%20Site%20List%20and%20Summary-%20Student%20Enrollment%20\[Most%20Current\].pdf](http://web.sfusd.edu/Services/research_public/rpa_student_enrollment/SFUSD%20School%20Site%20List%20and%20Summary-%20Student%20Enrollment%20[Most%20Current].pdf). Accessed September 14, 2015.

⁵⁵ SFUSD, *SFUSD Recommended Budget for Fiscal Year 2015 – 2016*, p. 22, June 23, 2015. Available online at <http://www.sfusd.edu/en/assets/sfusd-staff/about-SFUSD/files/budget/Budget%20Book%20Master%20Vol%20I.pdf>. Accessed December 1, 2015.

⁵⁶ SFUSD, SF Address & School Locator, December 2015. Available online at <http://enrollinschool.org/lookup/>. Accessed on December 2, 2015.

⁵⁷ SFUSD, *Capital Plan FY 2010-2019*, pp. 24-25, September 2009. Available online at <http://www.sfusd.edu/en/assets/sfusd-staff/about-SFUSD/files/capital-plan-final-2010-2019.pdf>. Accessed September 16, 2015.

requests for a school than openings, the student placement process uses a series of preferences, known as tie-breakers, to assign students to one of their requested schools.⁵⁸

The elementary school nearest the project site is Daniel Webster Elementary School at 465 Missouri Street, located approximately 0.5 mile west of the project site.⁵⁹ For the 2015-2016 academic year, this school had a total K-5 enrollment of 275 students.⁶⁰ According to the current SFUSD enrollment and matriculation process, students who attend this elementary school would subsequently attend James Lick Middle School at 1220 Noe Street, approximately 2.5 miles west of the project site.⁶¹ This school has an enrollment of 601 students.⁶² After middle school, students would apply to any high school in the City. The public high school nearest the project site is the International Studies Academy at 655 De Haro Street, approximately 0.7 mile west of the project site. The International Studies Academy has an enrollment of 128 students.⁶³

LIBRARIES

The San Francisco Public Library operates the Main Library at Civic Center, 100 Larkin Street, and 28 neighborhood branches throughout San Francisco. The libraries provide reading rooms, book lending, information services, access to technology, and library-sponsored public programs. The public libraries within 2 miles of the project site are the Potrero Branch at 1616 20th Street, approximately 0.5 mile northwest of the project site; the Mission Bay Branch at 960 Fourth Street, approximately 1 mile north of the project site; and the Bayview Branch at 5075 Third Street, approximately 1.6 miles south of the project site.

⁵⁸ SFUSD, Enrollment Guide 2016-2017. Available online at http://www.sfusd.edu/en/assets/sfusd-staff/enroll/files/2016-17/2016-17_enrollment_guide_en.pdf. Accessed September 26, 2016.

⁵⁹ For elementary schools, a lottery that gives some weight to the attendance area in which the student resides is used to assign students. There is no requirement that the elementary attendance area school be chosen by parents, nor can placement at the elementary attendance area school be guaranteed. Beginning in 2017, 5th grade students will receive an automatic, initial assignment into their designated middle school feeder. They will also have an opportunity to apply for enrollment at other middle schools, but there will be a guaranteed assignment into the middle school based on where they attend elementary school. Available online at <http://www.sfusd.edu/en/enroll-in-sfusd-schools/frequently-asked-questions.html>. Accessed September 15, 2015.

⁶⁰ SFUSD, Research Planning and Accountability Data Center, School List and Summary – Student Enrollment. Available online at [http://web.sfusd.edu/Services/research_public/rpa_student_enrollment/SFUSD%20School%20Site%20List%20and%20Summary-%20Student%20Enrollment%20\[Most%20Current\].pdf](http://web.sfusd.edu/Services/research_public/rpa_student_enrollment/SFUSD%20School%20Site%20List%20and%20Summary-%20Student%20Enrollment%20[Most%20Current].pdf). Accessed December 1, 2015.

⁶¹ SFUSD Address and School Locator. Available online at <http://www.sfpublicschools.org/php/>. Accessed September 14, 2015.

⁶² SFUSD, Research Planning and Accountability Data Center, School List and Summary – Student Enrollment. Available online at [http://web.sfusd.edu/Services/research_public/rpa_student_enrollment/SFUSD%20School%20Site%20List%20and%20Summary-%20Student%20Enrollment%20\[Most%20Current\].pdf](http://web.sfusd.edu/Services/research_public/rpa_student_enrollment/SFUSD%20School%20Site%20List%20and%20Summary-%20Student%20Enrollment%20[Most%20Current].pdf). Accessed December 1, 2015.

⁶³ SFUSD, Research Planning and Accountability Data Center, School List and Summary – Student Enrollment. Available online at <http://tinyurl.com/lekoo89>. Accessed September 14, 2015.

All branch libraries offer books at adult, teen, and children reading levels. Basic collections consist of fiction, nonfiction, and reference books; magazines; newspapers; audio books; CDs; and DVDs. Most of the San Francisco Public Library's collection of electronic resources is accessible to library patrons at all branch locations and available 24 hours a day at the San Francisco Public Library website.

Specific materials that are not available at a San Francisco Public Library branch may be obtained through the library's request system, Link+, or through the Interlibrary Loan program. Link+ allows library patrons to borrow items from participating libraries throughout California. Items typically arrive within five days and may be returned to any branch.⁶⁴ Interlibrary Loan allows library patrons to borrow items from various libraries and institutions in North America that have agreed to loan items to one another. Program participants may include local universities such as the University of California Berkeley, San Francisco State University, or Stanford University.⁶⁵

In 1994, San Francisco voters passed Proposition E, a Charter amendment that created the Library Preservation Fund, which provided library services and materials and aids in the operation of library facilities. Proposition E requires the City to maintain funding for the San Francisco Public Library at a level no lower than the amount it spent during the 1992–1993 fiscal year. Voters renewed the Library Preservation Fund in November 2007 (Proposition D).

Branch Library Improvement Program

The Branch Library Improvement Program (BLIP) resulted from a bond measure passed in November 2000 to provide \$106 million in funding to upgrade San Francisco's branch library system, and Proposition D, which passed in November 2007, authorizing additional funding to improve the branches. These funds were used to establish the Mission Bay Branch, which opened in July 2006. The BLIP included the preparation of the Branch Facilities Plan, which was intended to guide and identify the particular needs and standards for the neighborhood branches of the San Francisco Public Library. Public libraries near the project site have all been either newly constructed or renovated and expanded within the last five years due to BLIP funding.

⁶⁴ San Francisco Public Library, Link+, November 2015. Available online at <http://sfpl.org/index.php?pg=2000033101>. Accessed November 18, 2015.

⁶⁵ San Francisco Public Library, Interlibrary Loan (ILL) Frequently Asked Questions, November 2015. Available online at <http://sfpl.org/index.php?pg=2000032501>. Accessed November 18, 2015.

REGULATORY FRAMEWORK

POLICE

State

There are no State regulations related to police activities that are applicable to the Proposed Project.

Local

San Francisco Police Code

The San Francisco Police Code contains regulations for various types of activities such as automobile use, permitting and licensing, use of ports, and disorderly conduct.

San Francisco General Plan

The Community Facilities Element of the *San Francisco General Plan* establishes objectives, policies, and criteria for meeting San Francisco's long-range police facility requirements, including distribution, location, design, and use of police facilities. The following objective and policies are relevant to the Proposed Project:

- Objective 1: Distribute, locate, and design police facilities in a manner that will enhance the effective, efficient and responsive performance of police functions.
- Policy 1.1: Locate police functions that are best conducted on a centralized basis in a police headquarters building.
- Policy 1.2: Provide the number of district stations that balance service effectiveness with community desires for neighborhood police facilities.
- Policy 1.3: Enhance closer police/community interaction through the decentralization of police services that need not be centralized.

FIRE AND EMERGENCY MEDICAL SERVICES

State

California Fire Code

State fire regulations are set forth in Sections 13000 *et seq.* of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the California Building Code), fire protection and notification systems, fire protection devices (such as extinguishers and smoke alarms) and standards (such as those for high-rise buildings and child care facilities), and fire suppression training. California Fire Code Section 403.2 addresses public

safety for both indoor and outdoor gatherings, including emergency vehicle ingress and egress, fire protection, emergency medical services, public assembly areas and the directing of both attendees and vehicles (including vehicle parking), vendor and food concession distribution, and the need for the presence of law enforcement and fire and emergency medical services personnel at the event.

Local

San Francisco Fire Code

The San Francisco Fire Code incorporates by reference the 2013 California Fire Code (Title 24, California Code of Regulations, Part 9), with certain local amendments.⁶⁶ The San Francisco Fire Code was revised in 2013 to regulate and govern the safeguarding of life and property from fire and explosion hazards arising from the storage, handling, and use of hazardous substances, materials, and devices, and from conditions hazardous to life or property in the occupancy of buildings and premises; to provide for the issuance of permits, inspections, and other SFFD services; and to assess and collect fees for those permits, inspections, and services.⁶⁷ San Francisco Fire Code Section 503 (Fire Apparatus Access Roads) and San Francisco Public Works' 2015 Subdivision Regulations (Order No. 183447) establish requirements for minimum street widths to facilitate emergency equipment access. San Francisco Fire Code Section 511 (Local Fire Safety Feature Requirements) requires that buildings with floors used for human occupancy located 75 feet above the lowest level of SFFD vehicle access (usually 75 feet above the street) have an air replenishment system so that firefighters can refill air bottles for their self-contained breathing apparatus. The system must be tested and maintained pursuant to the Fire Department Administration Bulletin 5.07.⁶⁸

The SFFD reviews building plans to ensure that fire and life safety are provided and maintained in the buildings that fall under its jurisdiction. SFFD plan review applies to the following occupancy types:

- Assembly occupancies (including restaurants and other gathering places for 50 or more occupants);
- Educational occupancies (including commercial day care facilities);
- Hazardous occupancies (including repair garages, body shops, fuel storage, and emergency generator installation);

⁶⁶ City and County of San Francisco, *Ordinance 200-13* (File No. 130786, approved October 3, 2013, effective November 2, 2013, operative January 1, 2014).

⁶⁷ *Ibid.*

⁶⁸ All buildings that are covered by this section but are equipped with a fire service access elevator pursuant to California Building Code Section 3007 are not required to install an air replenishment system.

- Storage occupancies where potential exists for high-piled storage as defined in San Francisco Fire Code Section 112.2, Table 112 A;
- Institutional occupancies;
- High-rise buildings of all occupancies;
- Residential occupancies, such as hotels, motels, lodging houses, residential care facilities, apartment houses, small- and large-family day care homes, certified family-care homes, out-of-home placement facilities, halfway houses, and drug and/or alcohol rehabilitation facilities (R-1, R-2, R-2.1, R-3.1, and R-4 occupancies);
- Tents, awnings, or other fabric enclosures used in connection with any occupancy; and
- All fire alarm and fire suppression systems.

In coordination with the Department of Building Inspection, the SFFD conducts plan checks to ensure that all structures, occupancies, and systems listed above are designed in accordance with the San Francisco Building Code.

San Francisco General Plan

The Community Facilities Element of the *San Francisco General Plan* establishes objectives, policies, and criteria for meeting San Francisco's long-range fire and emergency medical facility requirements, including distribution, location, design, and use of facilities. The following objective is relevant to the Proposed Project:

- Objective 5: Development of a system of firehouses which will meet the operating requirements of the Fire Department in providing fire protection services and which will be in harmony with related public service facilities and with all other features and facilities of land development and transportation provided for other sections of the General Plan.

SCHOOLS

State

Senate Bill 50 and Proposition 1A

The major source of school funding for construction and modernization was the State School Construction Program until the passage of the Leroy F. Greene School Facilities Act, or Senate Bill 50 (Chapter 407, Statutes of 1998), and Proposition 1A, both of which passed on November 3, 1998. Senate Bill 50 (SB 50) and Proposition 1A provided a comprehensive school facilities financing and reform program, which authorized a \$9.2 billion school facilities bond issue. The provisions of SB 50 prohibit local agencies from denying land use approvals on the basis that school facilities are inadequate, and establish a school facility fee cap for legislative actions (e.g., general plan amendments, specific plan adoption, zoning plan amendments). According to Government Code Section 65996, the development fees authorized by SB 50 are

deemed to be full and complete school facilities mitigation. The legislation also recognized the need for the fee to be adjusted periodically to keep pace with inflation. Local jurisdictions are further precluded from imposing school-enrollment-related mitigation beyond the development impact fees. These provisions are in effect and would remain in place as long as subsequent State bonds are approved and available. As a result of this legislation, school districts would continue to levy a school fee under existing statutes (California Government Code Sections 65995, 65995.5, and 65995.7).

Local

San Francisco General Plan

The Community Facilities Element of the *San Francisco General Plan* establishes objectives, policies, and criteria for meeting San Francisco's long-range educational facility requirements, including distribution, location, design, and use of facilities. The following objective and policy are relevant to the Proposed Project:

Objective 8: Assure that public school facilities are distributed and located in a manner that will enhance their efficient and effective use.

Policy 8.1: Provide public school facilities for education in accordance with the need for such facilities as defined by the Unified School District and Community College District. Locate such facilities according to the Public School Facilities Plan and, wherever possible, make available for community use.

School Development Impact Fee

The SFUSD began collecting State-authorized school impact fees in 1987. These fees are collected to mitigate impacts associated with enrollment growth (e.g., enrollment growth from new residential development). The SFUSD collects fees for all construction and building permits issued within the City. Developer fee revenues are used, in conjunction with other SFUSD funds, to support efforts to complete capital improvement projects. Development impact fees are collected when building permits are issued and are based on the type of land use and its size, rather than the anticipated number of new students that may be generated.⁶⁹ The current fees applicable to the Proposed Project are \$3.36 per square foot of space for residential development, \$0.54 per square foot of covered and enclosed space for commercial/industrial development applicable to the Office land use category, \$0.425 per square feet of space for commercial/industrial development applicable to the Industrial/Warehousing/Manufacturing land use

⁶⁹ SFUSD, Developer Impact Fee Annual and Five Year Reports for the Fiscal Year Ending June 30, 2015, December 8, 2015, p. 2. Available online at http://www.sfusd.edu/assets/sfusd-staff/_site-wide/files/SFUSD_AnnualFiveYearReports_FY1415.pdf. Accessed May 20, 2016.

category, and \$0.346 per square foot of covered and enclosed space for commercial/industrial development applicable to the Retail and Services land use category.⁷⁰

LIBRARIES

San Francisco General Plan

The Community Facilities Element of the *San Francisco General Plan* establishes objectives, policies, and criteria for meeting San Francisco's long-range facility requirements, including the distribution, location, design, and use of library facilities. The following objective is relevant to the Proposed Project:

- Objective 6: Development of a public library system in San Francisco which will make adequate and efficient library service freely available to everyone within the City, and which will be in harmony with related public service facilities and with all other features and facilities of land development and transportation provided for in other sections of the *General Plan*.

San Francisco Public Library Strategic Plan (2003–2006)

The *San Francisco Public Library Strategic Plan (Strategic Plan)* was adopted in 2003 and is the library's guiding policy and planning document. The *Strategic Plan* does not set a standard for library service, but provides every library with a unifying organizational vision and system-wide goals. These goals are broad and flexible so that services can be tailored to the unique needs of each neighborhood.

IMPACTS AND MITIGATION MEASURES

SIGNIFICANCE THRESHOLDS

The threshold for determining the significance of impacts in this analysis is consistent with the environmental checklist in Appendix G of the State CEQA Guidelines, which has been modified by the San Francisco Planning Department. For the purpose of this analysis, the following threshold was used to determine whether implementing the Proposed Project would result in a significant impact to public services. Implementation of the Proposed Project would have a significant effect on public services if the Proposed Project would:

- L.1 Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any

⁷⁰ San Francisco Planning Department, San Francisco Citywide Development Impact Fee Register, December 1, 2015. Available online at http://default.sfplanning.org/administration/Master_Impact_Fee_Schedule_2016_DBI_Register-040416.pdf. Accessed March 20, 2016.

public services such as fire and emergency medical protection, police protection, schools, libraries, or other services.

APPROACH TO ANALYSIS

The impact analysis considers the increase in demand for public services that would occur under the Proposed Project, and whether or not significant adverse physical impacts would result with the increase in demand. The Proposed Project could have a significant impact on public services if (1) it would require the construction of new or physically altered governmental facilities in order to maintain acceptable levels of public services, and (2) the construction or alteration of such facilities would result in one or more substantial adverse impacts on the environment.

Those features of the Pier 70 Mixed-Use District Project that could affect public services within the project site would be different under the Maximum Residential Scenario and the Maximum Commercial Scenario. Since each scenario would result in different estimated population and employment numbers, each scenario is analyzed separately in the “Impact Evaluation” discussion, below.

PROJECT FEATURES

The Proposed Project entails the development of the 28-Acre Site and the Illinois Parcels at Pier 70. The Proposed Project would include residential, commercial-office, and retail/arts/light-industrial (RALI) uses. Under the provisions of the proposed Special Use District (SUD), the Proposed Project would provide a flexible land use program, under which certain parcels could be developed for primarily commercial-office or residential uses. The two scenarios, the Maximum Residential Scenario and the Maximum Commercial Scenario, would have different effects on the increase in demand for public services. The Maximum Residential Scenario would have 3,025 residential units, 1,102,250 gross square feet (gsf) of commercial use, and 479,980 gsf of RALI use (269,495 gsf of retail, 67,375 gsf of restaurant, and 143,110 gsf of art/light-industrial). The Maximum Commercial Scenario would result in 1,645 residential units, 2,262,350 gsf of commercial use, and 486,950 gsf of RALI use (275,075 gsf of retail use, 68,765 gsf of restaurant use, and 143,110 gsf of art/light-industrial). As shown in Table 4.L.1: Population and Employment Estimates for the Maximum Residential Scenario and the Maximum Commercial Scenario, the Proposed Project would introduce approximately 3,735 (under the Maximum Commercial Scenario) to 6,868 (under the Maximum Residential Scenario) residents to the project site, depending on which scenario is constructed. The proposed new residential uses would displace a portion of the existing on-site employment, but overall employment at the project site would increase. Under the Proposed Project, between approximately 5,599 (under the Maximum Residential Scenario) to 9,768 (under the Maximum Commercial Scenario) on-site employees would be introduced to the project site (see Table 4.L.1). Since the Maximum

Residential Scenario would generate an average daily population of approximately 12,465 persons on the project site (6,868 residents and 5,599 employees), it would have the greater potential impact on public services.

Table 4.L.1: Population and Employment Estimates for the Maximum Residential Scenario and Maximum Commercial Scenario

	Maximum Residential Scenario	Maximum Commercial Scenario
Population of 28-Acre Site ¹	4,881	2,497
Population of Illinois Parcels	1,987	1,238
Total	6,868 residents	3,735 residents
Employment at 28-Acre Site ²	5,443	8,754
Employment at Illinois Parcels	156	1,014
Total	5,599 employees	9,768 employees

Notes:

¹ ABAG Projections 2013 estimates 2.27 persons per household in San Francisco for 2015.

² Employment numbers for residential, open space, and parking uses were determined utilizing the factors in Table III.C-7 from the City of San Francisco, Candlestick Point-Hunters Point Shipyard Phase II Development Plan EIR, p. III.C-12, November 2009.

IMPACT EVALUATION

Police

Impact PS-1: The Proposed Project would not result in the need for new or physically altered facilities in order to maintain acceptable service ratios, response times, or other performance objectives for police protection. (*Less than Significant*)

Maximum Residential Scenario

Impacts on police protection services are considered significant if an increase in population would result in an increased demand for services that would require the construction or expansion of new or altered facilities that might have an adverse physical effect on the environment. The Proposed Project would be constructed in a fully developed area of San Francisco. However, the project site is underutilized and implementation of the Proposed Project would introduce new uses (e.g., residential, commercial-office, RALI, and open space) and increase the density of development at the project site.

The existing population of the Bayview Police District is approximately 80,000.⁷¹ The Maximum Residential Scenario would add up to 6,868 residents to the project site (4,881 residents on the 28-Acre Site and 1,987 residents on the Illinois Parcels), which would increase the number of people residing in the Bayview Police District by about 8.6 percent.⁷² Furthermore, the number of employees at the project site would increase by approximately 5,599 under the Maximum Residential Scenario (5,443 employees on the 28-Acre Site and 156 employees on the Illinois Parcels). The addition of residents and employees at the project site would incrementally increase demand for police protection services. Assuming 6,868 new residents at the project site and the Bayview Police District's average reported crime rate of about 55.39 crimes per 1,000 residents per year,⁷³ the Maximum Residential Scenario could add about 381 additional calls for assistance per year. This represents an 8.3 percent increase in calls per year.

The *District Station Boundary Analysis Report* includes housing and population projections for each respective police district. This report indicates that there would be 15,206 new residential units added to the Bayview Police District as part of its projected district growth; however, the housing projections do not include the proposed new residential units associated with the Proposed Project.⁷⁴ Boundary line changes proposed in the *District Station Boundary Analysis Report* would reduce the Bayview Police District's service area, allowing it to absorb future population and employment growth within the district. Therefore, although the 3,025 new residential units proposed under the Maximum Residential Scenario were not accounted for in the *District Station Boundary Analysis Report's* calculations, no new facilities or physical alterations to the Bayview Police District's existing facilities would be expected to be needed to meet the increased demand generated by the Proposed Project.⁷⁵

The increased demand generated by the Maximum Residential Scenario would require one patrol unit, which typically consist of up to five officers on staggered shifts.⁷⁶ The Port of San Francisco would continue to contract with the SFPD for two additional officers to provide police services to the project site. The *Pier 70 Waterfront Site and Illinois Street Parcel Development*

⁷¹ SFPD, San Francisco Police Department 2014 Annual Report. Available online at <https://www.dropbox.com/s/mpfjb7eoy54vsrb/2014%20Annual%20Report.pdf?dl=0>. Accessed May 25, 2016.

⁷² 6,868 [approximate Maximum Commercial Scenario population] / 80,000 [existing Bayview Police District population] = 8.6 percent increase.

⁷³ SFPD, CompStat, December 2013. Available online at <http://www.sf-police.org/Modules/ShowDocument.aspx?documentid=27342>. Accessed September 22, 2015.

⁷⁴ City and County of San Francisco – Controller's Office, *District Station Boundaries Analysis*, March 3, 2015, p. 65. Available online at <http://sfcontroller.org/Modules/ShowDocument.aspx?documentid=6273>. Accessed September 14, 2015.

⁷⁵ E-mail communication with Sarah Dennis-Phillips, Office of Economic & Workforce Development, December 1, 2015.

⁷⁶ City and County of San Francisco, *Pier 70 Waterfront Site and Illinois Street Parcel Development Projects Findings of Fiscal Responsibility and Feasibility*, May 21, 2013, pp. 28-29.

Projects Findings of Fiscal Responsibility and Feasibility, prepared for the Proposed Project, further indicated that, depending on the demand for additional supervisory and other specialized law enforcement services in addition to patrol, and the number and type of service calls generated from the project site, the number of required sworn officers could be greater. Nevertheless, the provision of additional police services, including those requiring additional patrol vehicles, would not require the need for new or physically altered facilities in order to maintain acceptable service ratios, response times, or other performance objectives for police protection.⁷⁷ Police staffing increases are expected to occur over the next several years to meet the City Charter mandate for the number of sworn police officers.⁷⁸ The increases in staff across the SFPD would further alleviate any demand for additional staff as a result of the Proposed Project.

In conclusion, the Maximum Residential Scenario would result in an increase in the average daily population (approximately 6,868 residents and 5,599 employees) at the project site and would cause an incremental increase in demand for police services. Additional police officers would be needed as a result. However, the increase in demand would not require the construction of a new facility, or the expansion of existing facilities to maintain acceptable service ratios, response times, or other performance objectives.⁷⁹ Therefore, impacts to police services under the Maximum Residential Scenario would be less than significant, and no mitigation measures are necessary.

Maximum Commercial Scenario

As shown in Table 4.L.1, the Maximum Commercial Scenario would add up to 3,735 residents to the project site (2,497 on the 28-Acre Site and 1,238 on the Illinois Parcels), which would increase the number of people residing in the Bayview Police District by about 4.7 percent.⁸⁰ Furthermore, the number of employees at the project site would increase by approximately 9,768 (8,754 on the 28-Acre Site and 1,014 on the Illinois Parcels). The addition of residents and employees at the project site would incrementally increase demand for police protection services in the Bayview Police District, which has an average reported crime rate of about 55.39 crimes per 1,000 residents per year.⁸¹ Assuming 3,735 new residents at the project site and the same

⁷⁷ E-mail communication with Sarah Dennis-Phillips, Office of Economic & Workforce Development, December 1, 2015.

⁷⁸ SFPD, Annual Report 2013, pp. 56-57. Available online at <https://dl.dropboxusercontent.com/u/76892345/Annual%20Reports/2013%20Annual%20Report.pdf>. Accessed September 14, 2015.

⁷⁹ E-mail communication with Sarah Dennis-Phillips, Office of Economic & Workforce Development, December 1, 2015.

⁸⁰ $3,735$ [approximate Maximum Commercial Scenario population] / $80,000$ [existing Bayview Police District population] = 4.7 percent increase.

⁸¹ SFPD, CompStat, December 2013. Available online at <http://www.sf-police.org/Modules/ShowDocument.aspx?documentid=27342>. Accessed September 22, 2015.

crime rate, the Maximum Commercial Scenario could add about 207 additional calls for assistance per year. This represents a 4.8 percent increase in calls per year.

The *District Station Boundary Analysis Report* includes housing and population projections for each respective police district. This report indicates that there would be 15,206 new residential units added to the Bayview Police District as part of its projected district growth; however, the housing projections do not include the proposed new residential units associated with the Proposed Project.⁸² Boundary line changes proposed in the *District Station Boundary Analysis Report* would reduce the Bayview Police District's service area, allowing it to absorb future population and employment growth within the district. Therefore, although the 1,645 new residential units proposed under the Maximum Commercial Scenario were not accounted for in the *District Station Boundary Analysis Report's* calculations, no new facilities or physical alterations to the Bayview Police District's existing facilities would be expected to be needed to meet the increased demand generated by the Proposed Project.⁸³

This increase in the number of calls for service is less than the increase assumed with implementation of the Maximum Residential Scenario. Similar to the discussion above for the Maximum Residential Scenario, the increase in residents and on-site employment under the Maximum Commercial Scenario may result in the need for additional officers (up to one patrol unit) in the Bayview Police District, but it would not necessitate the need for the construction of a new facility, or the expansion of existing facilities, to maintain acceptable service ratios, response times, or other performance objectives.⁸⁴ Therefore, impacts to police services under the Maximum Commercial Scenario would be less than significant, and no mitigation measures are necessary.

Fire and Emergency Medical Services

Impact PS-2: The Proposed Project would not result in the need for new or physically altered facilities in order to maintain acceptable response times for fire protection and emergency medical services. (*Less than Significant*)

Maximum Residential Scenario

The Proposed Project would include the construction and rehabilitation of residential, commercial, and RALI buildings that would be subject to current State and local regulations governing fire and life safety in new construction and building rehabilitation. The SFFD, Port,

⁸² City and County of San Francisco – Controller's Office, *District Station Boundaries Analysis*, March 3, 2015, p. 65. Available online at <http://sfcontroller.org/Modules/ShowDocument.aspx?documentid=6273>. Accessed September 14, 2015.

⁸³ E-mail communication with Sergeant Maria Ciriaco, Legal Division, SFPD, November 4, 2015.

⁸⁴ E-mail communication with Sarah Dennis-Phillips, Office of Economic & Workforce Development, December 1, 2015.

and Department of Building Inspection would review building plans to ensure that buildings comply with fire and life safety measures specified in the San Francisco Fire Code, including measures relating to emergency access and egress; sprinkler systems; fire-rated design, construction, and materials; restrictions on occupant loads; emergency lighting; smoke alarms; and mechanical smoke control and emergency notification systems. Adherence to San Francisco Fire Code requirements would minimize demand for future fire protection services. The buildings located on Parcels A, B, C1, C2, D, E1, F, G, H1, and H2 that would have a final finished floor elevation located 75 feet above street level would have an air replenishment system so that firefighters can refill air bottles for their self-contained breathing apparatus, in accordance with Section 511 of the San Francisco Fire Code. Conversely, the design of the proposed buildings could include a fire access elevator to comply with San Francisco Fire Code Section 511.

To meet firefighting water requirements, the Proposed Project may be required to include two sources of water delivery (connections to two separate water mains), additional AWSS high-pressure distribution piping, an AWSS cistern, and/or potable water supply system equipment. The AWSS components would be in addition to the existing potable water fire hydrants located near Buildings 11 and 21. (Refer to “High-Pressure Auxiliary Water Supply System” in Section 4.K, Utilities and Service Systems, pp. 4.K.9-4.K.10, for more information regarding the AWSS system.) Additionally, the SFFD fire boats could provide a supplemental source of emergency water, because the Third Street/Islais Creek AWSS fire boat manifold is located approximately 1,000 feet south of the project site.

Fire Station No. 37, which would be the first responder to the project site, is relatively underutilized (three to four responses per day) and could accommodate the incremental increase in fire and medical emergency incidents that would be attributable to the increase in the residential and employment population at the project site. However, the introduction of 6,868 residents and 5,599 employees to the project site under the Maximum Residential Scenario would require additional fire protection personnel and medical emergency responders. Specifically, one additional ambulance would be staged at Fire Station Nos. 37, 4, 7, or 9 to help the SFFD maintain adequate response times. The increase in fire protection and emergency medical personnel, including those required for the additional ambulance, would not require the construction of a new facility or the expansion of an existing facility.⁸⁵ The Maximum Residential Scenario is not anticipated to substantially alter demand for services such that it would degrade service levels below adopted performance objectives, nor would it require new

⁸⁵ E-mail communication with Jessica Kennedy, Senior Analyst/Support Services, SFFD, November 13, 2015.

fire protection service facilities or emergency medical response services beyond those now provided and planned for the area.⁸⁶

Currently, Code 3 emergency response times at the project site are less than 4 minutes, well within the State objective of 5 minutes and the City standard of 4 minutes and 30 seconds. Code 3 response times are anticipated to remain within the State objective, as the new street network would be designed in accordance with the San Francisco Fire Code and San Francisco Public Works regulations related to emergency access. Emergency vehicles would continue to access the project site from Third, Illinois, 20th, and 22nd streets. Additionally, the Proposed Project includes a new connection to the site from Illinois Street at 21st Street. Aside from the general increase in vehicle traffic that would result from the additional activity at the project site, the Proposed Project would not inhibit emergency access to the project site.⁸⁷ Standards for emergency access and circulation have been included in the *Pier 70 SUD Design for Development*, and the Pier 70 Transportation and Master Utilities Plans. Standards in the *Pier 70 SUD Design for Development* include emergency vehicle rights-of-way, fire access amenities, and road weight capacities. Furthermore, the internal circulation plan would be approved by the Planning Department and SFFD to ensure sufficient maneuverability within the project site.

For the reasons stated above, the Maximum Residential Scenario's impacts on fire protection and emergency medical services would be less than significant, and no mitigation measures are necessary.

Maximum Commercial Scenario

Under the Maximum Commercial Scenario, the introduction of 3,734 new residents and 9,768 net new workers to the project site, and the construction of residential and commercial buildings on the project site would increase the demand for fire and emergency medical services, similar to the Maximum Residential Scenario. Because the increase in call volumes, and thus the demand for services, is anticipated to be similar under both scenarios, the impact on fire and emergency medical services identified above for the Maximum Residential Scenario would also apply to the Maximum Commercial Scenario. Like the Maximum Residential Scenario, the Maximum Commercial Scenario would require additional fire and emergency medical personnel. To accommodate the increased demand, one additional ambulance would be staged at Fire Station Nos. 37, 4, 7, or 9 to help the SFFD maintain adequate response times. The increase in fire protection and emergency medical personnel, including those required for the additional ambulance, would not require the construction of a new facility or the expansion of an existing

⁸⁶ E-mail communication with Jessica Kennedy, Senior Analyst/Support Services, SFFD, November 13, 2015.

⁸⁷ Fehr & Peers, *Transportation Impact Study - Pier 70 Mixed-Use District Project*, December 2016, p. 67.

facility.⁸⁸ Therefore, impacts under the Maximum Commercial Scenario would be less than significant, and no mitigation measures are necessary.

Schools

Impact PS-3: The increase in students associated with implementation of the Proposed Project would not require new or expanded school facilities, the construction of which could result in substantial adverse impacts. (*Less than Significant*)

Maximum Residential Scenario

The Maximum Residential Scenario would increase the project site population by 6,868 residents, of which a portion would be school-aged children who would attend public elementary, middle, and high school facilities in San Francisco, and would add a total of 3,025 residential units to the project site (2,150 residential units on the 28-Acre Site and 875 residential units on the Illinois Parcels). Based on SFUSD's student generation rate of 0.16 student per residential unit,⁸⁹ the Maximum Residential Scenario would increase the demand for schools by about 484 students.

As discussed above under Environmental Setting, elementary school enrollment has increased over the last five years, and SFUSD projections indicate that elementary school enrollment will continue to grow. The SFUSD maintains a property and building portfolio that has a student capacity for over 90,000 students. Current student enrollment is considerably less than 90,000, resulting in substantial amounts of surplus property.⁹⁰ Thus, even with increasing enrollment, SFUSD facilities throughout the City are underutilized. The increase of 484 students associated with the Proposed Project would not substantially change the demand for schools, nor would it result in the need for new facilities.

The Leroy F. Greene School Facilities Act of 1998, or SB 50, restricts the ability of local agencies to deny land use approvals on the basis that public school facilities are inadequate. SB 50, however, permits the levying of developer fees to address local school facility needs resulting from new development. Local jurisdictions are precluded under State law from imposing school-enrollment-related mitigation beyond the school development fees. The SFUSD collects these fees for all construction and building permits issued within the City and County of San Francisco. Developer fee revenues are used, in conjunction with other SFUSD funds, to support efforts to complete capital improvement projects. The School Impact Fees to be collected

⁸⁸ E-mail communication with Jessica Kennedy, Senior Analyst/Support Services, SFFD, November 13, 2015.

⁸⁹ Lapkoff & Gobalet Demographic Research, Inc., *Demographic Analyses and Enrollment Forecasts for the San Francisco Unified School District*, p. 1-6, March 18, 2010.

⁹⁰ SFUSD, Capital Plan 2010-2019, pp. 24-25. Available online at <http://www.sfusd.edu/en/assets/sfusd-staff/about-SFUSD/files/capital-plan-final-2010-2019.pdf>. Accessed September 15, 2015.

for residential, commercial, and retail developments are set at \$3.36 per square foot for new residential construction, \$0.346 per square foot for retail space, \$0.54 per square foot for office space, and \$0.425 per square foot for commercial/industrial development.⁹¹

The estimated increase of 484 students under the Maximum Residential Scenario would not result in the need for new facilities because of the existing available capacity within the SFUSD system. Furthermore, the Proposed Project would pay school impact fees. Therefore, project-related impacts on SFUSD facilities and services that would result from the implementation of the Maximum Residential Scenario would be less than significant, and no mitigation measures are necessary.

Maximum Commercial Scenario

The Maximum Commercial Scenario would increase the project site population by 3,735 residents, of which a portion would be school-aged children who would attend public elementary, middle, and high school facilities in San Francisco, and would provide a total of 1,645 residential units on the project site (1,100 residential units on the 28-Acre Site and 545 residential units on the Illinois Parcels). Based on SFUSD's student generation rates of 0.16 student per residential unit, the Maximum Commercial Scenario would increase the demand for schools by about 264 students; however, as described above for the Maximum Residential Scenario, existing school facilities have the capacity to meet increases in demand. The estimated increase of 264 students under the Maximum Commercial Scenario would not result in the need for new facilities because of the available capacity within the SFUSD system. In addition, the project sponsors would be required to pay school impact fees. Thus, implementation of the Maximum Commercial Scenario would not substantially change the demand for schools, nor would it result in the need for new facilities. Therefore, project-related impacts on SFUSD facilities and services that would result from the implementation of the Maximum Commercial Scenario would be less than significant and no mitigation is required.

⁹¹ San Francisco Planning Department, San Francisco Citywide Development Impact Fee Register, Updated December 1, 2015, Effective January 1, 2016. Available online at http://default.sfplanning.org/administration/Master_Impact_Fee_Schedule_2016_DBI_Register-040416.pdf. Accessed on May 26, 2016.

Libraries

Impact PS-4: The Proposed Project would not result in an increase in demand for library services that could not be met by existing library facilities. (*Less than Significant*)

Maximum Residential Scenario

The number of new residents at the project site under the Maximum Residential Scenario would represent an approximately 448 percent increase in the total number of residents located in Census Tract 226, the census tract in which the project site is located. Although this increase would be large for the project area, it would not be substantial for the City as a whole, because it would represent 2.4 percent of the total Citywide population growth from 2010 to 2040. Residential and nonresidential development associated with the Proposed Project would increase demand for local library services. However, the existing library branches near the project site have been either recently renovated or constructed in accordance with the Branch Facilities Plan (the Mission Bay Branch was constructed in July 2006, the Potrero Branch was renovated in 2010, and the Bayview Branch was constructed in 2013), and they would therefore be able to meet the demand for library services generated by the 6,868 residents and 5,599 employees at the project site under the Maximum Residential Scenario. The Proposed Project would not require construction of new or expanded library facilities beyond those already proposed or under construction under the BLIP.

Thus, the new, existing, and rebuilt San Francisco Public Library branches could accommodate increased demand from the Proposed Project, and no additional library facilities would be required. Impacts on library services would be less than significant, and no mitigation measures are necessary.

Maximum Commercial Scenario

The number of new residents at the project site under the Maximum Commercial Scenario would represent an approximately 243 percent increase in the total number of residents located in Census Tract 226, the census tract in which the project site is located. Although this increase would be large for the project area, it would not be substantial for the City as a whole, because it would represent 1.3 of the total Citywide population growth from 2010 to 2040. As discussed above, the surrounding branch libraries have been either recently renovated or constructed under the BLIP. The existing library branches near the project site would be able to meet the demand for library services generated by the up to 3,735 residents and 9,768 employees at the project site under the Maximum Commercial Scenario. Impacts on library services would therefore be less than significant.

Cumulative Impacts

Impact C-PS-1: The Proposed Project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable contribution to significant adverse cumulative impacts that would result in a need for construction of new or physically altered facilities in order to maintain acceptable service ratios, response times, or other performance objectives for any public services, including police protection, fire protection and emergency services, schools, and libraries. (*Less than Significant*)

Build-out of the Proposed Project, in conjunction with reasonably foreseeable projects, would increase overall demand for police protection, fire protection and emergency response, schools, and library services provided by the SFPD, SFFD, SFUSD, and San Francisco Public Library, respectively. This analysis of the contribution of the Proposed Project to cumulative public service impacts is based on consideration of the reasonably foreseeable future projects identified in Section 4.A, Introduction to Chapter 4, pp. 4.A.12-4.A.18, along with development anticipated as part of the *Central SoMa Plan*, formerly known as the *Central Corridor Plan*. The *Central SoMa Plan* is a draft plan that may allow for a large amount of development activity along a planned rail corridor in the vicinity of the project site. If approved, it would increase the number of housing units within the Central SoMa Plan Area by up to 7,500 new units and would create up to 45,000 new jobs, requiring the provision of additional public services.⁹²

Police Services

The Proposed Project would add to the demand for police services in the Bayview Police District, but the cumulative contribution of the Proposed Project's impact with the reasonably foreseeable development projects would not be considerable. The SFPD has not identified a Citywide service gap and has undergone redistricting options in order to ensure that all areas of the City are adequately served by police service facilities. Recent redistricting efforts in June 2015 anticipated and planned for population growth of 15,205 households, or an increase of 26.5 percent, in the Bayview Police District. Although the Proposed Project was not considered in the *District Station Boundary Analysis*, other reasonably foreseeable projects used in the cumulative analysis of this Environmental Impact Report were within the scope of analysis. As the redistricting would reduce the Bayview Police District's service area, it would be able to absorb future population and employment growth within the district, including the demand generated by the Proposed Project.⁹³ Therefore, the estimated increase in residents as a result of the Proposed Project (Maximum Residential Scenario and Maximum Commercial Scenario) and

⁹² San Francisco Planning Department, *Central SoMa Plan & Implementation Strategy*, Draft for Public Review, August 2016.

⁹³ E-mail communication with Sergeant Maria Ciriaco, Legal Division, SFPD, November 4, 2015.

reasonably foreseeable projects would not be beyond levels anticipated and planned for by the SFPD. Based on Board of Supervisors legislation, the police district boundaries would be reanalyzed every 10 years with consideration to workload, district boundary considerations, response times, and facilities. For these reasons, the Proposed Project's contribution to cumulative demand on police services Citywide would not be cumulatively considerable. The Proposed Project, in combination with past, present, and reasonably foreseeable future projects, would have a less-than-significant cumulative impact on police services.

Fire Protection and Emergency Services

The Proposed Project would add to the demand for fire response and emergency medical services within Battalion 10, but the cumulative contribution of the Proposed Project's impact combined with the reasonably foreseeable development projects would not be considerable. The SFFD has not identified a Citywide service gap, and the incremental increase in the demand for fire and emergency medical services as a result of the Proposed Project and reasonably foreseeable projects would not be beyond levels anticipated and planned for by the SFFD. If necessary, Fire Station Nos. 4, 7, and 9, along with other nearby stations, could respond to calls in the event Fire Station No. 37 staff and equipment are unavailable or require additional support. For these reasons, the Proposed Project's contribution to cumulative demand on fire and emergency medical services Citywide would not be cumulatively considerable. The Proposed Project, in combination with past, present, and reasonably foreseeable future projects, would have a less-than-significant cumulative impact on fire and emergency services.

Schools

Development of cumulative projects within the City would result in increased population and employment-generating uses, which would result in an associated increase in the number of students to be served by the SFUSD. Although San Francisco elementary student populations have increased over recent years, middle and high school enrollment continues to decline; thus, SFUSD facilities remain well below their capacity of 90,000 students. The SFUSD began collecting State-authorized school impact fees in 1987, which are collected to address impacts associated with enrollment growth. The SFUSD collects these fees for most construction and building permits issued within the City. Developer fee revenues are used, in conjunction with other SFUSD funds, to support efforts to complete capital improvement projects. According to Government Code Section 65996, the development fees authorized by SB 50 are deemed to be full and complete school facilities mitigation. Therefore, the Proposed Project's contribution to cumulative demand on public schools would not be cumulatively considerable. The Proposed Project, in combination with past, present, and reasonably foreseeable future projects, would have a less-than-significant cumulative impact on school services.

Libraries

The BLIP, launched as a result of a 2000 bond measure, included plans for construction of eight new library branches. Most branch libraries in the City have already been constructed or renovated, or are planned for future construction or renovation under the BLIP (including the newly constructed Bayview Branch and renovated and expanded Potrero Branch).

As stated in the *San Francisco Public Library Strategic Plan*, there is no national standard for library service, and each library must evaluate how it may best meet the needs of the community. To this end, the *Strategic Plan* provides every library facility and program with a unifying organizational vision and system-wide goals. Development of reasonably foreseeable future projects within the City, in conjunction with past and present development, would increase resident population as well as generate new employment, which could increase demand on public library resources. The *Strategic Plan* is based, in part, on population projections for build-out of the *General Plan*, which includes the development anticipated at the project site. All cumulative projects (past, present, and reasonably foreseeable) that are within the identified population projections are understood to have been considered during development of the *Strategic Plan*. Therefore, it is not anticipated that cumulative development would result in a significant cumulative impact on library services. There is no significant cumulative impact with respect to library resources, and the Proposed Project's contribution to cumulative demand would be less than significant.

In conclusion, the Proposed Project, in combination with past, present, and reasonably foreseeable future projects, would result in less-than-significant cumulative impacts on public services.

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