

## F. PUBLIC SERVICES

This section analyzes the impacts of the Project, which would legalize existing enrollment and operational conditions at Bentley School (and allow for a maximum enrollment of up to 360 students), on the following public services: police services, fire services, public schools, libraries, and parks and recreation. Service locations, capacities, and expansion possibilities are described, in addition to relevant regulations and service standards. The criteria used to determine whether the Project's impacts on public services would be considered significant are summarized immediately below and listed prior to discussion of impact conclusions. The City of Oakland has established Standard and Conditions of Approval that apply to all proposed projects within the City. Those standards applicable to public services are mainly relevant to development projects. As the proposed Project would not include any new construction, these public services standards would not be applicable to the Project.

The setting and impacts for each public service addressed in this section are evaluated separately. The impact analysis is based on the following criteria of significance:

The proposed project would have a significant impact on public services and recreation if it would:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities 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:
  - police services;
  - fire and emergency services;
  - schools; or
  - other public facilities.
- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

### 1. Police Services

This section includes a brief discussion of police service in and around the Project site and evaluates the Project's impacts on these services.

**a. Existing Facilities and Staff.** Police services are provided to the project site by the Oakland Police Department (OPD). OPD staffs the Primary Public Safety Answering Point, dispatches patrol officers to both emergency and non-emergency calls for service, conducts preliminary and follow-up criminal investigations, has primary traffic enforcement jurisdiction on all public roadways within the City (except the freeways), maintains preventative patrols, and supports community policing efforts, as well as various other duties. Police headquarters are located at 250 Frank H. Ogawa Plaza, in

Oakland. The OPD has mutual aid agreements with all surrounding agencies and with some neighboring cities, including the cities of Berkeley, Richmond, and San Francisco.<sup>1</sup>

The OPD currently employs approximately 719 officers, though it has an authorized strength of 803 police officers.<sup>2</sup> All of these are paid full-time positions. OPD is currently in an accelerated hiring mode to meet the goals of Measure Y, which expanded community policing resources. The resident-to-police-officer ratio is approximately 2.2 officers for every 1,000 residents.<sup>3</sup> Calls for service are defined and dispatched based on their urgency.

Oakland comprises six patrol areas, which are divided into 57 police beats. The Project site is located within Patrol Area 1, Beat 13, which is generally bounded by the Contra Costa County line to the north, the Contra Costa County line to the east, Highway 13 from Moraga Avenue to the Berkeley city border to the south, and the Berkeley city border from Highway 13 to the Contra Costa County line to the west.<sup>4</sup> The OPD has the goal of assigning one police officer for every beat; however, due to staffing shortages, the OPD does not always meet this goal.<sup>5</sup> The frequency of patrols varies depending on the activity level on any given day.

During most shifts, officers are continuously responding to calls and have little or no time to work proactively with residents and business persons within their beats. Officers conduct preventive patrols as time permits. Calls for service are defined and dispatched based on their urgency. Priority A calls are the most serious and are dispatched within 1 or 2 minutes after the call is received. Priority B calls represent the greatest volume of calls and consist of offenses such as domestic disputes and stolen vehicles. Priority C and D calls are non-emergency, and due to staffing constraints, some of these calls may be handled by non-sworn civilians.

Problem Solving Officers (PSOs) were established as a conduit for OPD's community policing effort. Measure Y allows for the assignment of 57 PSOs. However, due to staff shortages, only some PSO positions have been filled. The purpose of the PSOs is to improve OPD's response to emergency calls, increase community outreach, and improve communications with the patrol. Currently, one PSO sergeant is responsible for Patrol Area 1 and 2, including Bentley School.

The average City-wide response time for Priority A, B, and C calls in May 2007 was approximately 5, 54, and 114 minutes, respectively. The estimated response time to emergency calls at the Project site is 3 minutes, and the estimated response time for non-emergency calls depends on the demand for police services in the rest of the City.<sup>6</sup>

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<sup>1</sup>Alameda Local Agency Formation Commission, 2004. *Final Municipal Service Review; Volume I – Public Safety Services Appendix A*. September 16.

<sup>2</sup>Holmgren, Roland, 2007. Public Information Officer Oakland Police Department. Personal communication with LSA Associates, Inc. December 3.

<sup>3</sup>Alameda Local Agency Formation Commission, 2004. *Final Municipal Service Review; Volume I – Public Safety Services Appendix A*. September 16.

<sup>4</sup>Oakland, City of. Police Department, Your Officer. Website: [www.oaklandpolice.com/youroff/beat13Y.html](http://www.oaklandpolice.com/youroff/beat13Y.html)

<sup>5</sup>Holmgren, Roland, 2007. Public Information Officer, Oakland Police Department. Personal communication with LSA Associates, Inc. December 3.

<sup>6</sup>Ibid.

The most frequent law enforcement issues within the vicinity of the Project site are minor in nature. From September 2007 to January 2008, the majority of incidents within a 1-mile radius of the Project site were classified as thefts (including vehicle theft). Burglary and vandalism, which involve an action against property, were also reported within 1 mile of the site. In the Project area, most burglaries involve vehicles. Very few crimes occur within ½-mile of the site. Within ¼-mile of the site only one crime (involving theft) was reported between September 2007 and January 2008. However, during the second week of June 2007, the Firestorm Memorial Garden, located immediately south of the Project site, was vandalized. Twenty-five plaques honoring victims of the 1991 Oakland Hills fire were stolen and a bronze statue was partially destroyed.<sup>7</sup> The neighborhood was able to raise enough money to replace all of the plaques and to repair the statue.

**b. Police Services Impacts.** Less-than-significant impacts to police services are discussed first, followed by significant impacts. Increased demand for new police services is not an environmental impact in and of itself. However, if the Project necessitates new police facilities, the construction of such facilities could lead to physical impacts. Therefore, the proposed Project would have a significant impact on police services if it would result in substantial adverse physical impacts associated with the provision of or 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 for police services.

**(1) Less-than-Significant Police Services Impacts.** The Project would result in a less-than-significant impact to police services. According to a representative from the OPD, the primary law enforcement concern associated with the proposed Project is that legalizing the current enrollment and permitting a maximum enrollment of 360 students could result in a sustained increased demand for police services. However, the school has supported close to 360 students for the past several years, and these additional students have not resulted in a significant increase in demand for police services. As such, the proposed Project is not expected to increase demand beyond the existing demand, and would not require the construction of new facilities.

**(2) Significant Police Service Impacts.** The proposed Project would not result in any significant impact to police services in the City of Oakland.

## 2. Fire Services

This section describes fire protection and emergency medical services in Oakland and evaluates the Project's impacts on these services.

**a. Existing Facilities and Staff.** Fire services are provided by the Oakland Fire Department (OFD). The OFD serves the City of Oakland, and has mutual response agreements with the cities of Berkeley, Piedmont, and Alameda, the Alameda and Contra Costa County Fire Departments, and the East Bay Regional Park District. In addition to fire suppression, fire prevention, and emergency medical services (EMS), the OFD provides services through the Office of Emergency Services (OES), Citizens of Oakland Respond to Emergencies (CORE), the Wildfire Prevention District, and Emergency Dispatch.

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<sup>7</sup> Cai, Chang, 2007. Vandals Strike Memorial to Firestorm Victims, *The Daily Californian*. June 28. Website: [www.dailycal.org/sharticle.php?id=25348](http://www.dailycal.org/sharticle.php?id=25348).

The OFD covers approximately 56 square miles and serves approximately 410,600 people.<sup>8</sup> Across its 25 stations, the OFD has a total of 565 employees, including three battalion chiefs, 32 officers, 25 fire engineers, and 75 firefighters.<sup>9</sup> In addition, the OFD has 25 Type 1 engines, four Type 3 engines, seven aerial ladders, six brush patrols, one fireboat, one heavy duty rescue vehicle, two foam units (a cart designed for the rapid deployment of foam concentrate to flammable liquid fires or chemical spills), six airport rescue rigs, and four hose tenders (large mobile tanks of water mounted on trucks used in wildland firefighting or in rural areas that lack hydrants).<sup>10</sup>

All 911 calls placed within the City of Oakland are first received by the Oakland Police Department dispatch center. Calls determined to be in need of fire or medical emergency services are transferred to the OFD dispatch, which also provides dispatch services for the City of Emeryville Fire Department.<sup>11</sup> The OFD receives between 50,000 and 70,000 emergency and non-emergency calls per year. Of the emergency calls, approximately 80 percent are for emergency medical services, with the rest related to utilities, commercial alarms, residential structural fires, grass/wildland fires, and other emergencies. The OFD aims to provide emergency service response within 7 minutes of notification 90 percent of the time. Generally, service can be provided in that time frame to areas located within 1.5 miles of a fire station. The majority of the City, including the Project site, is located within 1.5 miles of one of Oakland's 25 fire stations.

Fire Station 7 would be the first responder to a fire emergency within the Project site. Fire Station 7 is located at 1006 Amato Drive, approximately 1.5 miles from the Project site. Station 7 was acquired in 1999 and is in excellent condition.<sup>12</sup> This station has one engine and one brush vehicle. The emergency response time for the Project site, from time of alarm to time of arrival, would be less than 7 minutes.<sup>13</sup> While the Project site is located on the Berkeley border, the Berkeley Fire Department would only respond to emergency calls on the site if the OFD requested Mutual Aid.

The OFD has identified the Oakland Hills area<sup>14</sup> as a service challenge because there are fewer stations in the area and access is difficult. Though several preventative measures and practices have been established by the Oakland and Berkeley Fire Departments since the 1991 Oakland Hills Fire, the narrow roads and rural terrain still make the area difficult to access.<sup>15</sup>

The OFD provides emergency medical services through the EMS division and is frequently the first responder to medical emergencies. At least one paramedic staffs each fire station engine and

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<sup>8</sup> Association of Bay Area Governments, 2007. *Projections 2007*.

<sup>9</sup> Edwards, James, 2007. Deputy Chief, Fire Prevention and Communications, Oakland Fire Department. Written communication with LSA Associates, Inc. December 11.

<sup>10</sup> Ibid.

<sup>11</sup> Alameda Local Agency Formation Commission, 2004. *Final Municipal Service Review; Volume I – Public Safety Services Appendix A*. September 16.

<sup>12</sup> Ibid.

<sup>13</sup> Edwards, James D., 2007. op. cit.

<sup>14</sup> The Oakland Hills area is an area defined by the OFD.

<sup>15</sup> Alameda Local Agency Formation Commission, 2004. *Final Municipal Service Review; Volume I – Public Safety Services Appendix A*. September 16.

firefighters are certified as emergency medical technicians. Private companies provide ambulance services under contract with Alameda County.

**b. Fire Services Impacts.** Less-than-significant impacts to fire services are discussed first, followed by significant impacts. An increase in demand for fire services is not an environmental impact in and of itself. However, if the Project necessitates new fire facilities, the construction of such facilities could lead to environmental impacts. Therefore, the Project would have a significant impact on fire services if it would result in substantial adverse physical impacts associated with the provision of or need for new or physically altered fire service facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire services.

**(1) Less-than-Significant Fire Services Impacts.** The Project would legalize the current number of students on the school site, allow for a maximum enrollment of 360 students, and legalize the hours and days of existing school operations. These existing uses would not substantially increase demand for fire and emergency services within the City of Oakland. However, demand for fire services would be marginally reduced if the new Major CUP was not granted, because the school would be required to reduce enrollment to 200 students and limit the hours of operation.

While the school has been operating under increased enrollment and expanded hours for a number of years without causing a major increase in demand for fire services, the OFD has identified access to the Project site as an area of concern.<sup>16</sup> The OFD has concerns about emergency vehicle access and evacuation from this area, in part because of the close proximity of Bentley School to Kaiser School. Legalizing enrollment could have an impact on emergency vehicle access to the area. The enrollment at the school would affect the area differently depending on the time of day and the time of year. Fire hazards are most significant between September and October.<sup>17</sup> A fire or other emergency during the school day could create roadway congestion that could strain an emergency response. The proposed Project's impact on emergency evacuation plans and routes is evaluated in Section IV.E, Hazards.

While allowing for a maximum enrollment of 360 students on the site could slow evacuation times from the area during an emergency, the proposed Project would not exceed the physical or financial capabilities of the OFD.<sup>18</sup> As such, the proposed Project would not require the expansion or construction of new fire service facilities and would have a less-than-significant environmental impact. The proposed Project's potential impacts regarding the exposure of people to fire hazards are evaluated in Section IV.E., Hazards.

**(2) Significant Fire Services Impacts.** The proposed Project would not result in any significant impact to fire and emergency services within the City of Oakland.

### 3. Public Schools

This section describes public schools in Oakland and evaluates the Project's impacts on these schools.

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<sup>16</sup> Edwards, James D., 2007, op. cit.

<sup>17</sup> Ibid.

<sup>18</sup> Ibid.

**a. Existing Conditions.** The Project site is located in an area served by the Oakland Unified School District (OUSD). The OUSD operates 61 elementary schools, 22 middle schools, 16 high schools, 36 charter schools, and 11 alternative education schools. In addition, there are 49 private or parochial schools within the City. Enrollment during the 2006 to 2007 school year, for both public schools and charter schools, was 47,012 students.<sup>19</sup> Since the 2000 to 2001 school year, Oakland public schools have experienced a sharp decline in enrollment. Losses were particularly large at the elementary school and middle school levels. By 2011, OUSD enrollment is expected to decline to 41,643 students.<sup>20</sup>

The residential neighborhoods in Oakland surrounding the Project site are served by the following public schools: Kaiser Elementary School, located one block northeast of the project site at 24 South Hill Court; Claremont Middle School, located at 5750 College Avenue; and Oakland Technical High School, located at 4351 Broadway.

The OUSD uses a student yield factor of 0.1 and 0.7 students for each market-rate and below-market-rate residential dwelling unit, respectively. The OUSD currently collects a facilities fee of \$2.24 per square foot for residential development and \$0.36 per square foot of commercial development.

**b. Public Schools Impacts.** Less-than-significant impacts to public schools are discussed first, followed by significant impacts. An increase in demand for public schools is not an environmental impact in and of itself. However, if the Project necessitates new school facilities, the construction of such facilities could lead to environmental impacts.

**(1) Less-than-Significant Public Schools Impacts.** While schools are important to the quality of life in the Project area, impacts to schools from increased development do not necessarily result in physical environmental impacts. However, if a development project overwhelms the school district's capacity and quality of service, it could be inconsistent with the General Plan.

The Project would legalize existing conditions at Bentley School, and would allow a maximum enrollment of up to 360 students, and would not increase the permanent residential population of the area. However, if the Project were not approved, 160 students would be required to enroll in other schools, which could lead to increased enrollment at other area public or private schools. As such, legalizing the current conditions would not have a significant adverse impact on public school services and facilities.

**(2) Significant Public Schools Impacts.** The proposed Project would not result in any significant impact to public schools within the City of Oakland.

#### **4. Libraries**

This section describes libraries in Oakland and evaluates the Project's impacts on library facilities.

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<sup>19</sup> California Department of Education, 2008. Educational Demographics Unit, DataQuest. Website: <http://dq.cde.ca.gov/dataquest/>. June 5.

<sup>20</sup> Lapkoff & Gobalet Demographic Research, Inc, 2004. *Demographic Update for Facilities Planning, Executive Summary*. May 20

**a. Existing Conditions.** The City of Oakland has 18 public library branches. In the 2006 to 2007 fiscal year, Oakland libraries served a total of 435,710 people, had 3,094,268 library visits (representing an increase of 25 percent from the 2004/2005 fiscal year), and housed a total of 2,101,819 materials in their collections.<sup>21</sup> Two branch libraries are located within 2 miles of the project site: the Montclair Branch, located at 1687 Mountain Boulevard; and the Rockridge Branch at 5366 College Avenue.

The 2006 Library Facilities Master Plan<sup>22</sup> identifies the Montclair Branch as a neighborhood library. While the Plan determined that the Montclair Branch cannot be reasonably or efficiently expanded on its current site, service upgrades are planned for the site. The 15,200-square-foot Rockridge Branch was identified for expansion to a 17,000- to 18,000-square-foot community library.

**b. Libraries Impacts.** Less-than-significant impacts to libraries are discussed first, followed by significant impacts. An increase in demand for libraries is not an environmental impact in and of itself. However, if the Project necessitates new library facilities, the construction of such facilities could lead to environmental impacts.

**(1) Less-than-Significant Libraries Impacts.** It is expected that the proposed enrollment and hours of operation on the Project site would not increase the demand for library services. During school hours, students would typically utilize the on-campus library, though after school, some students might use Oakland library resources for research projects. The Oakland library system has adequate capacity to serve the current demand, and as such the proposed Project would result in less-than-significant impacts to library services.

**(2) Significant Libraries Impacts.** The proposed Project would not result in any significant impact to libraries within the City of Oakland.

## 5. Parks and Recreation

The following subsection describes park and recreational facilities near the Project site, summarizes relevant policies, and evaluates the Project's potential impact on these facilities.

**a. Existing Facilities.** The City of Oakland Office of Parks and Recreation (OPR) provides recreational opportunities and cultural programs for residents of the City. OPR manages over 3,000 acres of parkland within the City limits. Facilities include 140 parks and playgrounds, 24 recreational centers and facilities, 54 ball fields, eight community gardens, and seven swimming pools.<sup>23</sup> Maintenance of these facilities is provided by the Oakland Public Works Agency.<sup>24</sup> Eighty-five percent of Oakland's open space is concentrated in the hills and along the shoreline. In terms of sheer numbers, the North Hills, where the Project site is located, has the largest area of open space (at 2,962

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<sup>21</sup> Oakland Public Library, 2008. *Oakland Public Library Annual Report, 2006-2007*. Website: [www.oaklandlibrary.org/Annual\\_Report.pdf](http://www.oaklandlibrary.org/Annual_Report.pdf).

<sup>22</sup> Oakland, City of, 2006. *Oakland Public Library Master Facilities Plan*. June.

<sup>23</sup> Oakland, City of, 2007. "Office of Parks and Recreations Spring and Summer 2007 Brochure."

<sup>24</sup> Oakland, City of, 2005. *Office of Parks and Recreation*. Website: [www.oaklandnet.com/parks/default.asp](http://www.oaklandnet.com/parks/default.asp).

acres) and the greatest number of vacant privately-owned parcels that provide unofficial open space (approximately 2,000 vacant parcels between 2,500 and 10,000 square feet).<sup>25</sup>

The City of Oakland park classification system includes neighborhood, community and region-serving parks and also consists of seven additional park categories, including: active mini-parks (typically less than 1 acre and usually located in high density neighborhoods); passive mini-parks (typically less than 1 acre in size, usually located in new subdivisions or redevelopment areas); linear parks; special use parks; resource conservation parks; athletic field parks (including school athletic fields); and school playgrounds. The City has a 10 acre per 1,000 residents park acreage standard and a 4 acre per 1,000 residents local-serving park acreage standard (includes parks with facilities that are not designated for a special purpose). The City provides approximately 8.26 acres of parkland per 1,000 residents and 1.33 acres of local-serving parks per 1,000 residents.<sup>26</sup> Because Oakland is predominantly developed, there are limited opportunities to increase the City's supply of parkland and open space.

The City of Oakland's General Plan contains the Open Space Conservation and Recreation Element (OSCAR), which has classified the area surrounding the Project site as the North Hills planning area. According to this document, the area contains 19 parks, including several that contain active, recreation, and resource conservation areas. The area has three region-serving parks, one passive mini-park, one athletic field park, one golf course, and one linear park. Five additional parks in the area are used exclusively as resource conservation areas and are undeveloped. Total parkland in the North Hills is 969.5 acres, which is supplemented by more than 5,000 acres of open space located in regional parks just beyond the Oakland Hills ridgeline (to the east). The vast majority of these area parks consist of steeply sloping lands which are undeveloped and are poorly suited for active recreation. Total local-serving park acreage is estimated to be 61 acres, for a ratio of 2.34 acres per 1,000 residents. Although this is among the highest ratios in the City, it is only about 60 percent of the adopted standard.

The closest public open space to the Project site is the Firestorm Memorial Garden, which is located immediately south of the Project site on Hiller Drive. The Firestorm Memorial Garden is approximately 0.2 acres and was built in 1994 to commemorate the victims of the 1991 Oakland Hills fire. The garden includes flower beds, benches, a metal sculpture, and 25 plaques honoring those who died in the fire. The garden was founded by the North Hills Landscape Committee, whose members include survivors of the 1991 fire.

The East Bay Regional Park District (EBRPD) provides regional recreational facilities, including 65 regional parks, 29 inter-park trails, and 1,150 miles of trails within parklands, and manages over 97,000 acres of land.<sup>27</sup> The closest regional park to the Project site is the Lake Temescal Regional Recreation Area, which is approximately 1 mile south of the Project site. The recreation area has a swim area, hiking trails, areas for fishing, and picnic areas. The Claremont Canyon Reserve is located approximately 1.5 miles west of the Project site on Stonewall Road in Berkeley. The EBRPD

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<sup>25</sup> Ibid.

<sup>26</sup> Oakland, City of, 1996. *Open Space, Conservation, and Recreation (OSCAR) Element, General Plan*. June. Pgs. 4-9.

<sup>27</sup> East Bay Regional Park District. About Us. Website: [www.ebparcs.org/about](http://www.ebparcs.org/about)

manages 208 acres in the middle and lower canyon. The Claremont Canyon Reserve is used primarily for hiking.

**b. Relevant Policies.** Relevant policies and actions from the City's General Plan regarding parks and recreation are described below:

- Policy OS-2.2: Enhance the availability and usefulness of Oakland's schoolyards and athletic fields as open space resources by (a) working with the Oakland Unified School District to make schoolyards and school athletic fields available to the public during non-school hours...(c) encouraging private schools, including church schools, to improve the visual appearance of asphalt yard areas.
  - Action REC-5.1.3: Expand recreational opportunities for young people to provide a viable, positive alternative to anti-social behavior. Consider extended hours of operation at certain recreation centers, evening sports events, and other after-hours activities oriented towards Oakland youth.
  - Action REC-7.2.1: Strive to provide After School programs in every junior high or middle school in the City by the year 2000. Explore funding sources to expand the After School Program.

**c. Parks and Recreation Impacts.** Less-than-significant impacts to parks and recreation are discussed first, followed by significant impacts. An increase in demand for parks and recreation services is not an environmental impact in and of itself. However, if the Project accelerates the deterioration of parks or requires the expansion of recreational facilities, that could lead to significant impacts.

**(1) Less-than-Significant Parks and Recreation Impacts.** Implementation of the proposed Project would result in the following less-than-significant impacts on parks and recreation:

**Result in Physical Deterioration of Park and Recreation Facilities.** The proposed Project would legalize the current number of students on the site, and allow for a maximum enrollment of up to 360 students, and would not directly increase the residential population of Oakland. Since the proposed Project would not result in an increase in the City's population (and associated long-term demand for parks and recreational facilities), the Project would not contribute substantially to the physical deterioration of regional parks and facilities.

However, implementing the proposed Project could result in misuse of the Firestorm Memorial Garden, especially since the drop-off/pick-up zone is adjacent to the northern part of the garden. Under current conditions, up to 352 students walk by the garden in the mornings and afternoons every day. Visits to the site indicate that the Memorial Garden does not receive heavy use by students; typically, students leave or return to waiting vehicles and do not enter the park. The layout of the garden does not encourage intense use by students. The garden is a thin strip of land that is located on the west side of Hiller Drive, just south of the Project site. It is covered in flower beds, bushes, and trees. Three benches are located on the sidewalk and face away from the garden. There are no trails or pathways winding through the site. In the mornings and afternoons, students walk on the sidewalk located along the perimeter of the garden, and without a path, are not likely to wander through the site.

The highest concentrations of students walk by the garden before and after school when there are adult supervisors on the sidewalk by the drop-off/pick-up area. The presence of authority figures likely deters misuse of the garden before and after school. Therefore, given the layout of the garden and the limited times during the day that the majority of children and parents walk by it, legalizing

existing conditions at Bentley School and allowing for a maximum enrollment of up to 360 students would not be expected to result in substantial physical deterioration of this public park.

**Require the Construction of New Park or Recreation Facilities.** The proposed Project does not include plans for any new or expanded park or recreation facilities. In addition, the Project would not result in any direct population growth, and therefore, would not necessitate the construction or expansion of parks. As such, the proposed Project would have a less-than-significant impact on parks and recreational facilities.

**(2) Significant Parks and Recreation Impacts.** Implementation of the proposed Project would not result in any significant impacts to parks and recreation.

## **6. Cumulative Public Services Impacts**

Implementation of the proposed Project and cumulative projects would not increase the demand for public services beyond current levels. Due to the relatively small amount of projected growth in the vicinity of the Project site, it can be concluded that the proposed Project and cumulative projects would be adequately served by existing public services and would not require the construction of new service facilities that would themselves result in significant environmental impacts.