

## 3.12 Public Services and Recreation

This section addresses potential impacts on public services and recreational resources that could occur as a result of implementation of the proposed program. The public services addressed in this section include law enforcement services, fire protection services, and schools.

### 3.12.1 Environmental Setting

#### Public Services

##### *Fire Protection*

The Los Angeles County Fire Department (LACFD) serves unincorporated areas as well as many of the cities within the County; 21 of these cities are participating Permittees within the Enhanced Watershed Management Program (EWMP) areas. These cities include Hawthorne, West Hollywood, Malibu, Palos Verdes Estates, Rancho Palos Verdes, Rolling Hills Estates, Azusa, Bradbury, Duarte, Calabasas, Hidden Hills, La Canada Flintridge, Rosemead, San Gabriel, Temple City, Baldwin Park, Covina, Glendora, Industry, La Puente, and Santa Clarita (LACFD, 2013). LACFD employs approximately four thousand emergency personnel and works out of 170 fire stations across the County. In addition to fire suppression, the LACFD also provides fire prevention services, emergency medical services, hazardous materials services, and urban search and rescue services.

LACFD is organized into three different emergency operations bureaus, the North, Central, and East Regional Operations Bureau. The North Regional Operations Bureau includes 43 fire stations serving communities in the Antelope and Santa Clarita Valleys. The Central Regional Operations Bureau includes 51 fire stations serving communities in the central Los Angeles portions of the County. It also includes the Lifeguard Division based in Venice, which helps protect millions of annual visitors along 74 miles of the Pacific Coast. The East Regional Operations Bureau includes 76 fire stations servicing communities within the east side of the County (LACFD, 2013).

Under a mutual-aid pact covering federal forestlands, responsibility for nonstructural fires within the National Forest belongs to the U.S. Forest Service (USFS), while LACFD has the primary mission of suppressing structure fires. In addition, they have an automatic-aid agreement that allows the closest municipality to provide an initial response to fires that may occur in a part of another municipality. The LACFD has several standards to maintain adequate fire protection within their service area (Los Angeles County, 2014). The current standards for response times are:

- 5 minutes or less for response times for urban areas
- 8 minutes or less for suburban areas
- 12 minutes or less for rural areas

LACFD has designated lands in Los Angeles County with regard to their potential for wildland fires. These designations, determined by the County Forester, are based on an area's accessibility,

amount and type of vegetative cover, water availability, and topography. LACFD uses three wildland fire hazard designations: Moderate Fire Hazard, High Fire Hazard, and Very High Fire Hazard. Areas in Los Angeles County that are not designated within a fire hazard zone are not considered to be subject to wildland fire hazards (Los Angeles County, 2014).

The following 26 EWMP participating Permittees run city-owned fire departments: Beverly Hills, Culver City, Inglewood, Santa Monica, Hermosa Beach, Manhattan Beach, Redondo Beach, Torrance, El Segundo, Agoura Hills, Westlake Village, Culver City, Malibu, Arcadia, Monrovia, Sierra Madre, Alhambra, Burbank, Glendale, Los Angeles, Montebello, Monterey Park, Pasadena, Rosemead, San Marino, and South Pasadena, (LACFD, 2013).

### ***Police Protection***

The Los Angeles County Sheriff's Department (LASD) provides law enforcement services to more than one million people living within 90 unincorporated communities and to more than four million residents living within 40 contract cities. In addition, LASD provides law enforcement services to nine community colleges, Metro, and 48 Superior Courts (Los Angeles County, 2014). LASD comprises 11 divisions, including 3 patrol divisions and the Office of Homeland Security. In addition to proactive enforcement of criminal laws, the LASD also provides investigative, traffic enforcement, accident investigation, and community education functions.

Cities within the EWMP areas that contract with LASD for their police services include West Hollywood, Agoura Hills, Calabasas, Hidden Hills, Malibu, Westlake Village, Rancho Palos Verdes, Rolling Hills Estates, Rolling Hills, Duarte, Bradbury, Monrovia, Santa Clarita, Industry, La Puente, Glendora, Covina, Baldwin Park, Temple City, East Pasadena, Rosemead, La Canada Flintridge, Hidden Hills, and Calabasas. LASD staff has indicated that an officer-to-population ratio of 1 officer to every 1,000 residents provides the desired level of service for its service area (Los Angeles County, 2014). The LASD also has established an optimal service response time of 10 minutes or less for emergency response incidents (a crime that is presently occurring and is a life-or-death situation), 20 minutes or less for priority response incidents (a crime or incident that is currently occurring but is not a life-or-death situation), and 60 minutes or less for routine response incidents (a crime that has already occurred and is not a life-or-death situation). These response times represent the range of time required to handle a service call, which is measured from the time a call is received until the time a patrol car arrives at the incident scene. Response time is variable, particularly because the nearest responding patrol car may be located anywhere within the station's patrol area and may not necessarily respond directly from the station itself (Los Angeles County, 2014).

Nineteen cities within the EWMP areas run their own city police departments; these cities are Beverly Hills, El Segundo, Culver City, Inglewood, Santa Monica, Los Angeles, Hermosa Beach, Manhattan Beach, Torrance, Hawthorne, Arcadia, San Marino, South Pasadena, San Gabriel, Burbank, Monterey Park, Montebello, Glendale, and Alhambra.

## Schools

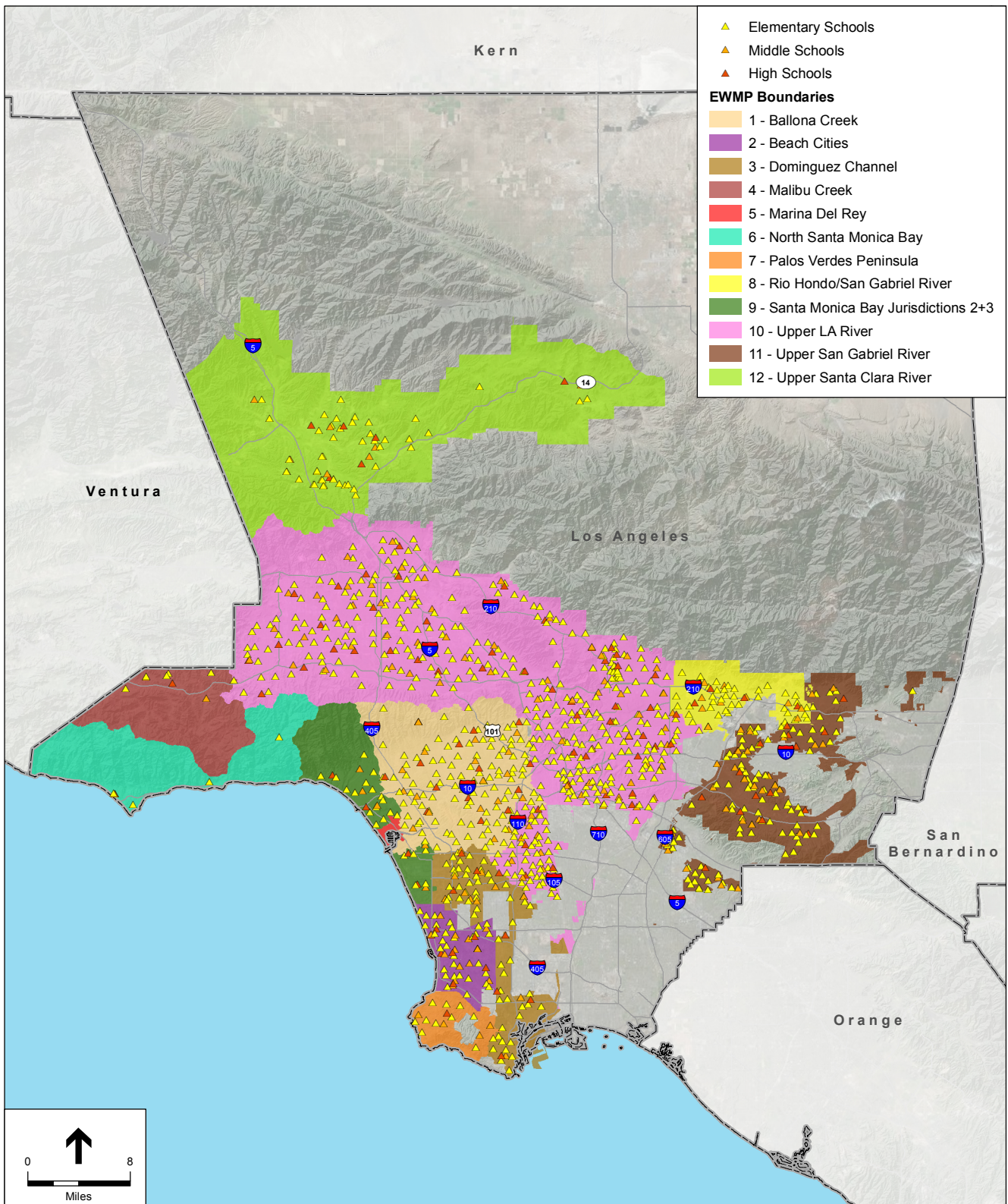
Within the County there are more than two thousand public schools (not including colleges) that serve over 1.5 million students. The County’s role in developing and managing educational facilities and programs is limited. However, the Los Angeles County Office of Education (LACOE) serves as a regional education agency and an intermediary between the local school districts and the California Department of Education. LACOE supports 80 public school districts and numerous other educational agencies within the County (LACOE, 2014). The largest public school district in the County is Los Angeles Unified School District (LAUSD), which has a service area of over 720 square miles and includes the City of Los Angeles, 31 smaller municipalities, and unincorporated areas. LAUSD has more than nine hundred schools and 640,000 students (LAUSD, 2014). There are several other smaller school districts in the EWMP study area. **Table 3.12-1** lists the school districts in each EWMP area. **Figure 3.12-1** shows the schools located throughout the EWMP areas, distinguishing between elementary schools, middle schools, high schools, and colleges; other schools such as pre-schools, colleges, and other types of education facilities are not shown.

**TABLE 3.12-1  
 SCHOOL DISTRICTS IN EWMP AREAS**

Watershed Management Group	Cities/Permittees	School Districts
Ballona Creek	Beverly Hills, Culver City, Inglewood, Los Angeles, Santa Monica, West Hollywood, County, LACFCD	Beverly Hills USD, Culver City USD, Los Angeles USD, Santa Monica-Malibu USD,
Beach Cities	Hermosa Beach, Manhattan Beach, Redondo Beach, Torrance, LACFCD	Hermosa Beach City School District, Manhattan Beach USD, Redondo Beach USD, Torrance USD,
Dominguez Channel	El Segundo, Hawthorne, Inglewood, Los Angeles, LA County, LACFCD	El Segundo USD, Hawthorne School District, Inglewood USD, Los Angeles USD,
Malibu Creek	Agoura Hills, Calabasas, Hidden Hills, Westlake Village, LA County, LACFCD	Las Virgenes USD, Los Angeles USD
Marina del Rey	Culver City, Los Angeles, LACFCD, LA County	Culver City USD, Los Angeles USD
North Santa Monica Bay	LA County, LACFCD, Malibu	Los Angeles USD, Santa Monica-Malibu USD,
Palos Verdes Peninsula	Palos Verdes Estates, Rancho Palos Verdes, Rolling Hills Estates, LA County, LACFCD	Palos Verdes Area USD, Palos Verdes Peninsula USD, Los Angeles USD
Rio Honda/San Gabriel River	Arcadia, Azusa, Bradbury, Duarte, Monrovia, County, LACFCD, Sierra Madre	Arcadia USD, Duarte USD, Monrovia USD, Los Angeles USD, Pasadena USD
Santa Monica Bay	Los Angeles, El Segundo, Santa Monica, LA County, LACFCD	Los Angeles USD, el Segundo USD, Santa Monica-Malibu USD
Upper LA River	Alhambra, Burbank, Calabasas, Glendale, Hidden Hills, La Canada Flintridge, Los Angeles, Montebello, Monterey Park, Pasadena, Rosemead, San Gabriel, San Marino, South Pasadena, Temple City, LA County, LAFCD	Alhambra USD, Burbank USD, Las Virgenes USD, La Canada USD, Los Angeles USD, Montebello USD, Pasadena USD, Rosemead School District, San Gabriel USD, San Marino USD, South Pasadena USD, Temple City USD
Upper San Gabriel River	Baldwin Park, Covina, Glendora, Industry, La Puente, LACFCD, LA County	Baldwin Park USD, Covina-Valley USD, Glendora USD, Los Angeles USD, Hacienda La Puente USD
Upper Santa Clara River	LA County, LACFCD, Santa Clarita	Los Angeles USD, Newhall School District

USD: Unified School District

SOURCE: Google, 2014.



SOURCE: ESRI.

LA County PEIR EWMP . 140474

**Figure 3.12-1**  
Public School Locations

## Parks and Recreational Resources

The County of Los Angeles Department of Parks and Recreation owns, operates, and maintains nearly 174 parks and recreational facilities (LADPR, 2014). The local park system encompasses approximately 609 total acres, and includes community parks (10 to 20 acres in size), neighborhood parks (3 to 10 acres in size), pocket parks (less than 3 acres in size), and park nodes (small pieces of open space that provide breaks to the urban landscape). Local parks serve neighborhoods within a maximum of a 2-mile radius of the park. The regional park system makes up 68,986 acres and includes regional parks (greater than 100 acres), community regional parks (20 to 100 acres), and special-use facilities (single-use facilities serving greater recreational or cultural needs). The parks in the regional park system provide service for areas within a 20- to 25-mile radius. Other recreational facilities available to County residents include trails, multi-benefit parks, school sites, city parks and facilities, private recreational facilities, and greenways (Los Angeles County, 2014).

The County goal for the provision of parkland is 4 acres of local parkland per 1,000 residents of the population in the unincorporated areas, and 6 acres of regional parkland per 1,000 residents of the total population of Los Angeles County (Los Angeles County, 2014). Section 21.24.340 of the County Code has a standard of 3 acres of local and 5 acres of regional parkland per 1,000 residents.

According to County estimates, there are currently a total of 1,066,414 people living in the unincorporated areas. This means that for every 1,000 residents there are a total of approximately 0.57 acres of local parkland, resulting in a local parkland deficit; the current acreage of available local parkland does not meet the County's goal for recreational facilities (Los Angeles County, 2014). In addition to the 609 acres of local parkland, there is a total of 68,986 acres of regional parkland in Los Angeles County at this time. For every 1,000 residents in Los Angeles County, there is a total of approximately 7 acres of regional parkland. There is a surplus of regional parkland, which exceeds the County's goal for regional parkland (Los Angeles County, 2014). **Figure 3.12-2** shows the County parks present within the EWMP areas.

Many of the cities/Permittees within the EWMP areas have city-owned and -operated parks. Given that a project-level analysis for each structural Best Management Practice (BMP) proposed in the EWMPs is beyond the scope of this Program Environmental Impact Report (PEIR), an extensive listing of each of the participating Permittees' parklands is not provided in this PEIR.

### 3.12.2 Regulatory Setting

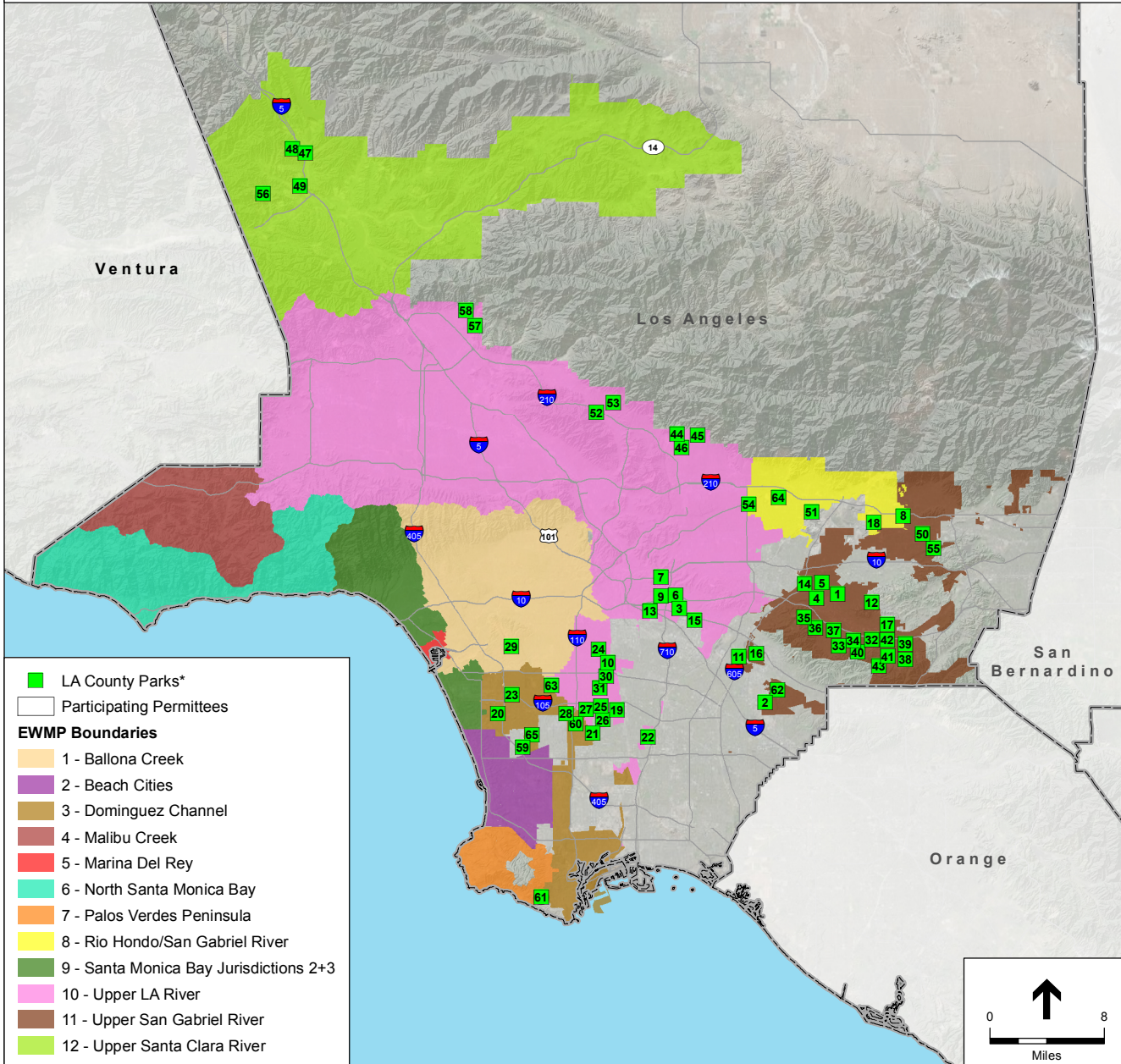
#### Local

##### ***Los Angeles County General Plan***

State law requires every city and county to include an Open Space Element in their General Plan. Both the existing and draft County of Los Angeles General Plan include a Parks and Recreation Element that discusses recreational facilities available within the County boundaries, and goals and policies addressing the growing and diverse recreation needs of the region. The following are the parks and recreation goals and policies.

**Parks**

- |                                 |                                 |                                   |                                 |  |
|---------------------------------|---------------------------------|-----------------------------------|---------------------------------|--|
| 1 - Allen J. Martin Park        | 14 - San Angelo Park            | 27 - Earvin Magic Johnson Park    | 40 - Gloria Heer Park           | 53 - Two Strike Park                   |
| 2 - Amelia Mayberry Park        | 15 - Saybrook Park              | 28 - Helen Keller Park            | 41 - Trailview Park             | 54 - Michillinda Park                  |
| 3 - Atlantic Avenue Park        | 16 - Sorensen Park              | 29 - Ladera Park                  | 42 - Carolyn Rosas Park         | 55 - Walnut Creek Park                 |
| 4 - Avocado Heights Park        | 17 - Sunshine Park              | 30 - Col. Leon H. Washington Park | 43 - Pathfinder Park            | 56 - Val Verde Park                    |
| 5 - Bassett Park                | 18 - Valleydale Park            | 31 - Ted Watkins Park             | 44 - Loma Alta Park             | 57 - El Cariso Park                    |
| 6 - Belvedere Park              | 19 - Mona Park                  | 32 - Countrywood Park             | 45 - Charles C. Farnsworth Park | 58 - Veterans Park                     |
| 7 - City Terrace Park           | 20 - Del Aire Park              | 33 - Thomas S. Burton Park        | 46 - Charles White Park         | 59 - Alondra Park                      |
| 8 - Dalton Park                 | 21 - Roy Campanella Park        | 34 - Pepperbrook Park             | 47 - Castaic Sports Complex     | 60 - Athens Park                       |
| 9 - Eugene A. Obregon Park      | 22 - East Rancho Dominguez Park | 35 - Los Robles Park              | 48 - Del Valle Park             | 61 - Deane Dana - Friendship Park      |
| 10 - Franklin D. Roosevelt Park | 23 - Lennox Park                | 36 - Manzanita Park               | 49 - Hasley Canyon Park         | 62 - Gunn Avenue Park (Adventure Park) |
| 11 - McNees Park                | 24 - Mary M. Bethune Park       | 37 - William Steinmetz Park       | 50 - Charter Oak Park           | 63 - Jesse Owens Park                  |
| 12 - Ringrove Park              | 25 - George W. Carver Park      | 38 - Bill Blevins Park            | 51 - Pamela Park                | 64 - Arcadia Park                      |
| 13 - Ruben F. Salazar Park      | 26 - Enterprise Park            | 39 - Rowland Heights Park         | 52 - Crescenta Valley Park      | 65 - Bodger Park                       |



\*City parks not mapped

SOURCE: ESRI.

LA County PEIR EWMP . 140474  
**Figure 3.12-2**  
 County Park Locations

### Existing General Plan 1980

**Goal:** Provide Outdoor Recreation Areas.

**Policy 27:** Provide low intensity outdoor recreation in areas of scenic and ecological value compatible with protection of these natural resources.

**Policy 28:** Develop local parks in urban areas as part of urban revitalization projects, wherever possible.

### Draft General Plan 2035

**Goal P/R 1:** Enhanced active and passive park and recreation opportunities for all users.

**Policy P/R 1.4:** Promote efficiency by building on existing recreation programs.

**Policy P/R 1.5:** Ensure that County parks and recreational facilities are clean, safe, inviting, usable and accessible.

**Goal P/R 2:** Enhanced multi-agency collaboration to leverage resources.

**Policy P/R 2.5:** Support the development of multi-benefit parks and open spaces through collaborative efforts among entities such as cities, the County, state, and federal agencies, private groups, schools, private landowners, and other organizations.

State law also requires the inclusion of a Safety Element that addresses environmental hazards and other safety concerns and aims to reduce the potential risk of death, injury, and economic damage resulting from natural and man-made hazards. The following presents the goals and policies in the existing and draft County of Los Angeles General Plan Safety Element.

### Existing General Plan 1980

**Goal:** Strengthen County short-term emergency response and long-term recovery capability.

**Policy 27:** Strengthen the capability of County agencies to effectively respond to earthquake and non-earthquake induced emergencies.

**Policy 28:** Upgrade regional heavy rescue capability including mobilization operations and resource management.

**Policy 29:** Encourage critical facilities to maintain and regularly update emergency response plans identifying safety procedures, disaster control capabilities, and evacuation procedures such as drills and exercises.

**Policy 30:** Upgrade interagency and multijurisdictional communications, planning and decision making to ensure efficient and integrated emergency response capability.

**Policy 31:** Promote improved cooperation with nonprofit and private sector emergency response organizations.

**Policy 35:** Strengthen emergency communication systems and improve cooperation between the media and emergency response agencies.

**Goal:** Continue to promote research on and mapping of natural and urban hazards; and improve safety information systems for planning, emergency response management and hazard mitigation.

**Policy 37:** Encourage research that will lead to the detailed mapping of ground response (microzonation) of Los Angeles County.

#### **Draft General Plan 2035**

**Goal S 3:** An effective regulatory system that prevents or minimizes personal injury, loss of life, and property damage due to fire hazards.

**Policy S 3.9:** Adopt by reference the County of Los Angeles Fire Department Strategic Fire Plan, as amended.

**Goal S 4:** Effective County emergency response management capabilities.

**Policy S 4.1:** Ensure that residents are protected from the public health consequences of natural or man-made disasters through increased readiness and response capabilities, risk communication, and the dissemination of public information.

**Policy S 4.2:** Support County emergency providers in reaching their response time goals.

**Policy S 4.3:** Coordinate with other County and public agencies, such as transportation agencies and health care providers on emergency planning and response activities, and evacuation planning.

**Policy S 4.5:** Ensure that there are adequate resources, such as sheriff and fire services, for emergency response.

#### ***Los Angeles County Strategic Fire Plan***

LACFD provides fire, safety, and emergency medical services to the unincorporated areas, as well as to several cities in the County. Their strategic plan is updated yearly and includes department goals and policies the department implements to ensure safety of residents and to carry out the County's public safety mission.

#### ***City General Plans and Municipal Codes***

The EWMP areas associated with the proposed program are located in multiple jurisdictions of Los Angeles County, which, aside from the County, also includes 46 cities. Each of these cities has their own independent General Plan and municipal code that regulates public service levels



and recreation resources within their jurisdictional boundaries. Given that a project-level analysis for each structural BMP proposed in the EWMPs is beyond the scope of this PEIR, an extensive listing of the public service and recreation policies and goals of each of the participating Permittees is not provided in this PEIR.

### 3.12.3 Impact Assessment

The proposed program's potential impacts were assessed using the California Environmental Quality Act (CEQA) Guidelines Appendix G Checklist. The following sections discuss the key issue areas identified in the CEQA Guidelines with respect to the proposed program's potential effects on public services and recreational resources.

#### Thresholds of Significance

For the purposes of this PEIR and consistency with Appendix G of the CEQA Guidelines, the project would have a significant impact on public services if the project would:

- 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 of the following public services:
  - Fire protection
  - Police protection
  - Schools
  - Parks
  - Other public facilities

Implementation of the proposed project may result in a potentially significant impact to recreational resources if the projects would:

- 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 that might have an adverse physical effect on the environment.

#### Program Impact Discussion

##### *Fire Protection Services*

**Impact 3.12-1: The proposed program could result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services.**

### **Structural (Regional, Centralized, and Distributed) BMPs**

Distributed BMPs are most likely to be implemented in high-density urban, commercial, industrial, and transportation areas where they would either replace or improve upon existing stormwater infrastructure. These types of BMPs are generally “retrofit”-type projects that replace existing impervious surfaces with pervious surfaces such as bioinfiltration cells, bioswales, porous pavement, and filter strips that tie into existing stormwater management systems. These projects may also augment the existing stormwater management systems with additional inlet screens, filter media systems, sediment removal systems, and diversions to sanitary sewer lines. Ground disturbance for distributed BMPs is typically less than 1 to 2 acres in extent, but may extend in some limited applications up to 5 acres where space is available. Centralized structural BMPs use similar elements to the types of BMPs used in distributed structural BMPs, but also collect, store, treat, and filter stormwater from multiple parcels and much larger drainage areas. Like centralized BMPs, regional BMPs can be implemented in a broad range of land use types, from high-density urban to open space, and can have multiple benefits (habitat, recreation, aesthetics, etc.). Centralized and regional structural BMPs require greater footprints for construction and implementation. Regional and centralized BMPs have similar construction methods.

The structural BMPs associated with the proposed program would be installed to treat existing water quality impairments and would not contribute to an increased need for fire protection services. The structural BMPs are not habitable structures, would not be constructed with flammable materials, and would not require fire protection services. Because of the relative scale of these infrastructure improvements, the construction of the various structural BMPs are not expected to result in the need for new or physically altered fire protection facilities. However, construction of new structural BMPs in streets, sidewalks, parkland, or other facilities (these may include public service facilities such as police stations, fire stations, and municipal maintenance yards) within existing high-density urban, commercial, industrial, and transportation areas, as well as associated staging areas, could temporarily disrupt the provision of fire services, resulting in potentially significant impacts. Implementation of **Mitigation Measure PS-1** (construction noticing) would reduce potential impacts to a less-than-significant level.

#### **Mitigation Measure:**

**PS-1:** The Permittee implementing the EWMP project shall provide reasonable advance notification to service providers such as fire, police, and emergency medical services as well as to local businesses, homeowners, and other residents adjacent to and within areas potentially affected by the proposed EWMP project about the nature, extent, and duration of construction activities. Interim updates should be provided to inform them of the status of the construction activities.

**Significance Determination:** Less than significant with mitigation (The application of this mitigation measure to specific BMP types and categories are identified in Table 3.12-2.)

### **Non-Structural (Institutional) BMPs**

The non-structural BMPs associated with the proposed program would consist of standards and policies related to development and maintenance activities in mostly urban areas. The non-

structural BMPs would not contribute to an increase in population within the project area, and would therefore not result in the need for new or physically altered fire protection facilities. There would be no impact.

**Mitigation Measures:** None required

**Significance Determination:** No impact

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### ***Police Protection Services***

**Impact 3.12-2: The proposed program could result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services.**

#### **Structural (Regional, Centralized, and Distributed) BMPs**

The structural BMPs associated with the proposed program would not contribute to an increase in population requiring police protection services. The structural BMPs are not habitable structures; they include mostly unobtrusive structures such as bioswales, pervious pavement, and bioretention areas and are not expected to be of a nature that would require police protection services. Larger-size regional and centralized BMPs could be located in public open spaces such as parks and large parking lots, but would not result in an increased need for police services. Centralized BMPs may include larger-scale diversion and treatment systems that may require added security systems to protect operating systems. These added security systems will be part of the design process and operation and maintenance of these facilities. The structural BMPs would therefore not result in the need for new or physically altered police protection facilities, as there would be no increase in the demand for police protection services.

**Mitigation Measure:** None required

**Significance Determination:** Less than significant

#### **Non-Structural (Institutional) BMPs**

Consisting of standards and activities designed to protect surface water quality, the non-structural BMPs associated with the proposed program are not expected to result in substantial increases of criminal activity and would not result in the need for new or physically altered police protection facilities. There would be no impact.

**Mitigation Measures:** None required

**Significance Determination:** No impact

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### **Schools**

**Impact 3.12-3: The proposed program could result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools.**

#### **Structural (Regional, Centralized, and Distributed) BMPs**

The structural BMPs associated with the proposed program would consist of structures such as bioinfiltration cells, bioswales, porous pavement and filter strips, low-flow diversions, detention ponds, treatment wetlands, and stream/creek restoration projects; it would not increase the population in the project area, so it would not generate additional students. However, some of the structural BMPs may be installed on school facilities, on or under large grassy fields typically found on school sites. Large open space areas that can be found on school sites offer potential opportunities for infiltration and recharge areas. Such impacts would be analyzed on a site-specific basis as projects are brought forward and will be reviewed under a subsequent CEQA process. However, because of the short construction period of the types of structural BMPs under consideration, construction activities would not be anticipated to significantly affect the operation of existing school facilities such that new or physically altered facilities would be required. In addition, the long-term operation of the structural BMPs would not likely affect the operation of existing school facilities because of the relatively small scale and design of these structural BMPs. Impacts would be less than significant.

**Mitigation Measures:** None required

**Significance Determination:** Less than significant

#### **Non-Structural (Institutional) BMPs**

The non-structural BMPs would consist of standards and activities designed to protect surface water quality, and would not increase population within the project area. Therefore, these BMPs would not result in the need for new or physically altered school facilities. There would be no impact.

**Mitigation Measures:** None required

**Significance Determination:** No impact

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### **Increased Use of Recreational Facilities**

**Impact 3.12-4: The proposed program could increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.**

#### **Structural (Regional, Centralized, and Distributed) BMPs**

The structural BMPs would not contribute to an increase in population and an associated increase in existing recreational facilities that could result in physical deterioration of existing facilities.

Some of the structural BMPs associated with the proposed program are anticipated to be located on existing parkland, as these open space areas offer ample area for potential subsurface spreading and infiltration. During the construction of such infrastructure, certain parts of selected parks and recreational facilities would temporarily be removed from service. Bike lanes and other linear recreational resources may also be affected by construction activities. Therefore, the construction of structural BMPs could temporarily limit the usage of the parks on which they are located, thereby potentially temporarily increasing the use at adjacent parks. Such temporary limits on access to parks and recreational resources may create increased demand on other parks and recreational resources within the EWMP area.

Once constructed, the structural BMPs would be in-ground or compatible with open space uses. The structural BMPs would operate passively and consist of mostly unobtrusive structures such as bioinfiltration cells, bioswales, porous pavement and filter strips, low-flow diversions, detention ponds, treatment wetlands, and stream/creek restoration projects. Construction periods for each BMP are expected to be relatively short, typically several months to a year. Because the construction will be temporary, the physical deterioration of park and recreational facilities to which recreational activities were diverted would not be substantial. The structural BMPs operated as part of the proposed program would be compatible with recreational and park-set activities; therefore, no impacts would occur during operation. Thus, construction and operation of structural BMPs would not increase the use of adjacent recreational facilities in such a way that would physically deteriorate them.

**Mitigation Measures:** None required

**Significance Determination:** Less than significant

#### **Non-Structural (Institutional) BMPs**

The non-structural BMPs associated with the proposed program would include programs that would lead to the establishment of various standards and/or physical maintenance activities, such as street sweeping. These BMPs would be preventative of water quality degradation and would not directly result in population growth or displace any existing recreational resources that would thereby result in the increased use of neighborhood or regional recreational resources. Therefore, they would not result in physical deterioration of existing facilities. There would be no impact.

**Mitigation Measures:** None required

**Significance Determination:** No impact

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#### ***Inclusion of Recreational Facilities***

**Impact 3.12-5: The proposed program could include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.**

#### **Structural (Regional, Centralized, and Distributed) BMPs**

The structural BMPs associated with the proposed program would not require the construction or expansion of recreational facilities, although some BMPs may be located within existing parks or would create new public park space. Implementation of these BMPs would not increase the population and would therefore not create a need for the construction of new or expansion of existing recreational facilities. The structural BMPs constructed and operated as part of the proposed program, if it is approved, would be located on existing recreational facilities and would be compatible with recreational uses during operation. Therefore, the BMPs would not impact parkland in such a way that would require its expansion or the creation of new parkland. Impacts would be less than significant.

**Mitigation Measures:** None required

**Significance Determination:** Less than significant

#### **Non-Structural (Institutional) BMPs**

The non-structural BMPs associated with the proposed program would not include recreational facilities. Non-structural BMPs would consist of programs and policies that would include development guidelines and activities designed to prevent surface water quality degradation, and would not specifically result in the construction of new or expansion of existing recreational facilities. There would be no impact.

**Mitigation Measures:** None required

**Significance Determination:** No impact

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## **Cumulative Impact Discussion**

### **Structural (Regional, Centralized, and Distributed) BMPs**

BMPs would be constructed throughout the watersheds. None of the facilities individually or cumulatively would increase population; require additional police, fire, or emergency services; or result in construction of new schools. Most of the distributed BMPs would be small in scale and would not result in cumulatively significant impacts to public services. Similarly, the larger regional and centralized BMPs would not result in cumulatively significant impacts to public services, but may instead provide multiple benefits by increasing public open space in urban areas. Therefore, the program's potential contribution to cumulative effects on public services and recreation is considered less than significant.

**Mitigation Measures:** Mitigation Measure **PS-1** (The application of this mitigation measure to specific BMP types and categories is identified in Table 3.12-2.)

**Significance Determination:** Less than significant with mitigation

**Non-Structural (Institutional) BMPs**

The non-structural BMPs associated with the proposed program would not result in impacts to public services or recreational facilities, as these BMPs will not consist of any physical construction. There would be no impact.

**Mitigation Measures:** None required

**Significance Determination:** No impact

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### 3.12.4 Summary of Impact Assessment

Table 3.12-2 shows a summary of the structural BMPs requiring mitigation.

**TABLE 3.12-2  
 SUMMARY OF PUBLIC SERVICES AND RECREATION IMPACTS REQUIRING MITIGATION MEASURES**

Structural BMPs	Thresholds of Significance					
	Adverse physical impacts due to new or altered fire protection facilities	Adverse physical impacts due to new or altered police facilities	Adverse physical impacts due to new or altered schools	Increased use of recreational facilities	Construction of recreational facilities	Cumulative Impacts
<i>Applicable Mitigation Measures:</i>	PS-1	None Required	None Required	None Required	None Required	PS-1
<b>Regional BMPs</b>						
Regional Retention and Infiltration	Yes	No	No	No	No	Yes
Regional Capture, Detention and Use	Yes	No	No	No	No	Yes
<b>Centralized BMP</b>						
Biofiltration	Yes	No	No	No	No	Yes
Constructed Wetlands	Yes	No	No	No	No	Yes
Treatment/Low-Flow Diversions	Yes	No	No	No	No	Yes
Creek, River, Estuary Restoration	Yes	No	No	No	No	Yes
<b>Distributed BMPs</b>						
Site Scale Detention	Yes	No	No	No	No	Yes
LID – Infiltration/Filtration BMPs – Porous Pavement, Green Streets, Bioswale/Filter Strips, downspout disconnects	Yes	No	No	No	No	Yes
LID – Green Infrastructure – Capture and Use – Cisterns, Rain Barrels, Green roofs, Planter Boxes	Yes	No	No	No	No	Yes
Flow-through Treatment BMPs	Yes	No	No	No	No	Yes
Source Control Treatment BMPs (catch basin inserts/screens, hydrodynamic separators, gross solids removal devices)	Yes	No	No	No	No	Yes
Low-Flow Diversions	Yes	No	No	No	No	Yes

NOTE: These conclusions are based on typical size and function of BMPs.