

## 5.12 PUBLIC SERVICES

This section of the Draft Environmental Impact Report (EIR) describes the affected environment and regulatory setting for public services that would be provided to the proposed project. It also describes the impacts on existing public services that would result from implementation of the proposed project and mitigation measures that would reduce these impacts. The following analysis of the potential environmental impacts related to public services is derived from the following sources available for review at the City of Redding Development Services Department, Planning Division:

- City of Redding. *2000 – 2020 General Plan*. October 2000.
- City of Redding. *Local Hazard Mitigation Plan*. November 2015.
- City of Redding. *Redding Municipal Code, Title 9, Health and Safety*. March 2018.
- City of Redding. *Redding Municipal Code, Title 13, Streets and Sidewalks*. March 2018.

The potential impacts on public services were evaluated based, in part, on correspondence with the local service agencies that serve the project area. This section provides baseline information on, and evaluates potential impacts on public services and policies related to the proposed project. Environmental and regulatory settings and mitigation measures to reduce significant impacts, where applicable, are provided.

### 5.12.1 ENVIRONMENTAL SETTING

SHASCOM (the Shasta Area Safety Communications Agency) is the consolidated 9-1-1 emergency response agency serving Shasta County. SHASCOM’s communications center provides emergency dispatching services to the Redding Police and Fire Departments, the Anderson Police Department, the Shasta County Sheriff’s Department, and ambulance services. The center is located at 3101 South Street, in Redding.

An inventory of fire and police protection facilities located in the vicinity of the project site is provided in Table 5.12-1, FIRE AND LAW ENFORCEMENT FACILITIES SERVING THE PROJECT AREA. The table identifies the type of facility, the name and address of the facility, and the approximate distance from the project site.

**Table 5.12-1  
FIRE AND LAW ENFORCEMENT FACILITIES SERVING THE PROJECT AREA**

Office / Station	Address	Distance from Project Site
<b>Fire Protection</b>		
Redding Fire Department (Headquarters)	777 Cypress Avenue	Approximately 1-mile west
Redding Fire Department (Fire Station 5)	955 Hartnell Avenue	Approximately 1.2 miles east
Redding Fire Department (Fire Station 1)	1335 Shasta Street	Approximately 1.8 miles northwest
<b>Law Enforcement</b>		
Redding Police Department	777 Cypress Avenue	Approximately 1-mile west
Shasta County Sheriff Department	1525 Court Street	Approximately 1.5 miles west
California Highway Patrol (CHP) Northern Division	2485 Sonoma Street	Approximately 1.7 miles west

Source: City of Redding; Google Earth 2018.

## FIRE PROTECTION SERVICES

### Redding Fire Department

The Redding Fire Department (RFD) is a full-service fire department providing responses to fires, medical emergencies, hazardous materials spills or public assistance requests. RFD has three main divisions: Administration, Operations, and Fire Prevention. RFD operates from eight stations and a Fire Headquarters at City Hall. The closest station to the proposed project is Fire Station Number 5, located at 955 Hartnell Avenue, approximately 1.5 miles east from the proposed project. This fire station is followed by Fire Station 1 located at 1335 Shasta Street, located approximately 1.8 miles to the northwest. Both stations are staffed by fire personnel with a minimum of Emergency Medical Technician (EMT) qualification or greater.<sup>1</sup>

The average RFD response time for emergencies is four to five minutes to most areas in the City.<sup>2</sup> According to RFD, fire service needs continue to increase due to the increase in homeless/transient activity City-wide.<sup>3</sup> RFD responded to 14,277 calls in 2017 with the following breakdown: 485 fires; 26 overpressures/explosions; 8,907 rescues and emergency medical calls; 228 hazardous conditions; 1,559 public service calls; 466 false alarms and false calls; 18 severe weather/natural disasters; and 19 special incident types.<sup>4</sup> The RFD Insurance Office Rating (ISO) is 2 (the ISO rating system ranks fire protection and sets insurance rates on a scale from 1 to 10 with 1 being the highest and 10 the lowest).<sup>5</sup>

Primary funding for the RFD is through the City of Redding General Fund, although additional funding is provided through the Fire Facilities Impact Fee. As of December 6, 2017, the development impact fee rate for office/general uses is \$929.00 per 1,000 square feet for office/general uses.<sup>6</sup>

### Mutual Aid and Automatic Aid

RFD maintains mutual/automatic aid agreements with the Shasta County Fire Department and the California Department of Forestry and Fire Protection (CAL FIRE). Automatic aid is assistance dispatched automatically by contractual agreement between two communities or fire districts. Mutual aid is arranged case by case. Under the automatic aid agreement with the Shasta County Fire Department, RFD responds automatically to emergencies in the county that are adjacent to the City and to emergencies in county islands in the City. The mutual threat zone (mutual aid) agreement enables both RFD and CAL FIRE to maximize resource utilization on wildland fire incidents in the City and surrounding county areas. RFD also participates in the Statewide Master Mutual Aid System. The City operates two fire engines under agreement with the California Emergency Management Agency.<sup>7</sup>

### Wildland Firefighting

Portions of the City—especially the western and northern parts—as well as much of the surrounding land west, east, and north of the City are in Very High Fire Hazard Severity Zones designated by CAL FIRE. In late July 2018, the Carr Fire was responsible for burning 229,651 acres and destroying

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<sup>1</sup> City of Redding Fire Department. *Response to Fire Service Questionnaire*.

<sup>2</sup> Ibid.

<sup>3</sup> Ibid.

<sup>4</sup> City of Redding Fire Department. *Incident Statistics, 2014-2017*. [Online]: [www.cityofredding.org/departments/fire-department/operations/statistics](http://www.cityofredding.org/departments/fire-department/operations/statistics). Accessed: May 11, 2018.

<sup>5</sup> City of Redding Fire Department. *Response to Fire Service Questionnaire*.

<sup>6</sup> City of Redding. *Impact Fees*. Revised December 6, 2017.

<sup>7</sup> Redding Fire Department. [Online]: <https://www.cityofredding.org/departments/fire-department/administration>. Accessed: October 8, 2018.

approximately 1,604 structures (1,077 homes) while causing damage to 277 additional residences. The fire impacted large areas of unincorporated Shasta County, including a large segment of west Redding. The Carr Fire resulted in over \$1.7 billion in damages, including \$1.5 billion in insured losses.

The City is responsible for the cost of wildland firefighting within the City, and Shasta County bears such responsibility in some unincorporated areas south and southeast of the City. The US Forest Service (USFS) conducts fire suppression in the Shasta-Trinity National Forest, which encompasses much of the northern and western parts of Shasta County. The State is responsible for wildland fire protection in most of the rest of Shasta County.<sup>8</sup> The proposed project site is not located within the City's Very High Fire Hazard Severity Zone.

## LAW ENFORCEMENT SERVICES

### Redding Police Department

Law enforcement for the proposed project is provided primarily by the City of Redding Police Department (RPD), located at 777 Cypress Avenue on the west side of the City Hall building. RPD serves over 93,000 persons over 60 square miles and is divided in four divisions: administration, field operations, investigations, and service. The Administrative and Services Divisions consists of many specialized sub-units that provide service and support to the public and the rest of RPD. The Investigations Division consists of a Captain who is the Division Commander, 3 Sergeants acting as unit supervisors, 18 Investigators, 1 Community Service Officers, 1 Police Records Supervisor, 1 Records Technician, and several volunteers.<sup>9</sup> Staffing levels for the RPD are down from 119 sworn officers and 16 non-sworn community services officers in 2008. Currently, total authorized sworn personnel for RPD is 107 full-time positions, although current staffing is 100 full-time positions.<sup>10</sup> The proposed project is located within the RPD's Beat 2.

The RPD maintains 10 response priority levels, 0 – 9, with 0 being the highest. Priority 0 calls are the highest priority emergency calls, consisting of shooting in progress, officer needs help, robbery in progress, assault with a deadly weapon, etc. Priority 1 calls consist of violent crime, including robber just occurred, assault, major injury traffic collisions, bomb threats, domestic violence just occurred, subject with a gun, and brandishing a weapon. Priority 2 calls consist of alarms, suspicious subjects, fights, and disturbance calls.<sup>11</sup>

As a result of the reduction if staffing, the RPD no longer responds to some low-priority calls for service (non-injury traffic collisions, private property collisions). Average response times have increased and vary greatly depending on the type of call for service. The RPD averages 270 calls for service per day, approaching 100,000 calls for services for the year (2017). Depending on the type of call, response times could vary from a few minutes to 8 hours.<sup>12</sup>

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<sup>8</sup> California Department of Forestry and Fire Protection (CAL FIRE). 2018. *Shasta County FHSZ (Fire Hazard Severity Zone) Map*. [Online]: [http://frap.fire.ca.gov/webdata/maps/shasta/fhszs\\_map.45.pdf](http://frap.fire.ca.gov/webdata/maps/shasta/fhszs_map.45.pdf). Accessed: October 8, 2018.

<sup>9</sup> City of Redding. *About the Redding Police Department*. [Online]: <http://reddingpolice.org/about/>. Accessed: May 11, 2018.

<sup>10</sup> City of Redding Police Department. *Response to Law Enforcement Questionnaire*. July 5, 2018.

<sup>11</sup> Ibid.

<sup>12</sup> Ibid.

## Shasta County Sheriff's Department

The Patrol Division of the Sheriff's Office is divided between two Patrol Stations and three Patrol Sub-Stations. The Shasta County Sheriff's Patrol Operations area of responsibility encompasses approximately 3,700 square miles of unincorporated Shasta County.<sup>13</sup> The City of Redding has a mutual-aid agreement with the Shasta County Sheriff's Department. While mutual aid requests are infrequent, they are a common practice among law enforcement agencies; especially, with regard to significant issues of public safety which require additional, immediate, resources. The Sheriff's Office, therefore, may also respond to certain emergencies at the proposed project site.

## California Highway Patrol

The California Highway Patrol (CHP) is responsible for managing and regulating traffic for the safe, lawful, and efficient use of California's highways, as well as providing disaster and lifesaving assistance. The CHP patrols State highways and County roadways, enforces traffic regulations, responds to traffic accidents, and provides service and assistance to disabled vehicles. When requested, it assists local governments during emergencies.

The CHP is divided into eight divisions. The proposed project is located in the CHP's Northern Division, which has 15 area offices, 11 resident posts, and 2 commercial vehicle enforcement facilities; it employs 535 uniformed officers and 180 non-uniformed employees. The closest CHP office to the project site is located in the City of Redding at 2485 Sonoma Street, approximately 1.7 miles west of the project site.<sup>14</sup>

## SCHOOLS

The proposed project is located within the following public school districts: the Shasta Union High School District and Enterprise Elementary School District. These school districts are discussed in further detail below. It should be noted that in the Redding area in addition to public schools, there are 13 private schools of which 77 percent are religiously affiliated, serving 1,932 students. Seven of these private schools offer high school education.<sup>15</sup>

In addition to private schools and traditional public schools, there are 15 charter schools available in Shasta County. A charter school is often created or organized by a group of teachers, parents, and community leaders or a community-based organization, and it is typically sponsored by an existing local public school board or county board of education.

## Shasta Union High School District

The Shasta Union High School District (SUHSD) provides public school services for grades 9-12 at eight schools: Enterprise High School; Foothill High School; Shasta High School; Pioneer Continuation High School; North State Independence High School; Shasta Adult School; Shasta Charter Academy; and University Preparatory School. For the 2016-2017 school year, SUHSD had a student population of 5,731 and employed 266 teachers.<sup>16</sup> The proposed project is within the boundaries of Enterprise High School, located at 3411 Churn Creek Road in Redding, approximately 1.5 miles southeast of the

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<sup>13</sup> Shasta County Sheriff's Office. [Online]: [www.co.shasta.ca.us/index/sheriff\\_index/divisions/patrol.aspx](http://www.co.shasta.ca.us/index/sheriff_index/divisions/patrol.aspx). Accessed: May 11, 2018.

<sup>14</sup> California Highway Patrol. [Online]: [www.chp.ca.gov/find-an-office/northern-division](http://www.chp.ca.gov/find-an-office/northern-division). Accessed: May 11, 2018.

<sup>15</sup> Private School Review. [Online]: [www.privateschoolreview.com/california/shasta-county](http://www.privateschoolreview.com/california/shasta-county). Accessed: May 11, 2018.

<sup>16</sup> Education Data Partnership. *Shasta Union High School District Demographics*. [Online]: <http://www.ed-data.org/district/Shasta/Shasta-Union-High>. Accessed: October 5, 2018.

proposed project. For the 2016-2017 school year, Enterprise High School had an enrollment of approximately 1,184 students and approximately 60 teachers.<sup>17</sup>

### **Enterprise Elementary School District**

The proposed project site is located within the Enterprise Elementary School District (EESD). EESD maintains nine schools that include the following K-5 schools: Alta Mesa Elementary School, Lassen View Elementary School, Rother Elementary School, and Shasta Meadows Elementary School. Boulder Creek School and Mistletoe School includes students in grades K through 8<sup>th</sup> and Parsons Junior High School accepts students in grades 6<sup>th</sup> through 8<sup>th</sup>. For the 2016-2017 school year, EESD had a student population of 3,786 and employed 181 teachers.<sup>18</sup>

### **PARKS AND RECREATION**

The City of Redding has a variety of recreational options available to its residents and visitors. A total of 65 developed park sites on 619.9 acres, which include regional parks, natural park areas, community parks, joint-use facilities, large and small neighborhood parks, special purpose facilities, and private neighborhood parks, serve the entire City. For park and recreational planning purposes, the City is divided into four quadrants. The proposed project is located in the Southwest Quadrant of Redding, the most populous of the four quadrants. The existing *General Plan* and the 2018 *Parks, Trails, and Open Space Master Plan* designates an area west of the proposed project across the Sacramento River as Parkview Riverfront Park. This park provides views of the river, trails, and picnic areas.

No neighborhood parks are located within the immediate area of proposed project. The recently approved Henderson Open Space Trail and Kayak Access project adjoins the proposed project to the west. Once complete the Henderson Open Space Trail and Kayak Access project will provide public access consisting of a driveway access from Henderson Road, 12 trailhead parking spaces and 17 kayak access parking spaces, a vehicle drop-off zone near a calm water lagoon, natural access to the river, 1,109 feet of 7-foot wide trail, utilizing an existing historic riverside road, and 600 feet of 5-foot wide trail connecting the kayak access area to the Cypress Avenue bridge.

The Recreation Element of the *General Plan* states in Goal R4 that 10 acres of parkland are recommended per 1,000 residents. This is achieved through a combination of the City's *Subdivision Ordinance* land dedication requirements as allowed by the State Map Act (Quimby Act) and other City parks funding programs (e.g., grants, use of General Fund, park development fees collected with building permits, gifts).

### **OTHER PUBLIC SERVICES**

#### **Library Services**

Shasta County provides library services throughout the County, including in the City of Redding. The County has three library branches: the Burney Branch Library (located at 37038 Siskiyou Street), the Anderson Branch Library (located at 3200 West Center Street), and the Redding Branch Library (located at 1100 Parkview Avenue). The Burney Branch Library opened in 1949, and was the first of the Shasta

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<sup>17</sup> Education Data Partnership. [Online]: <http://www.ed-data.org/school/Shasta/Shasta-Union-High/Enterprise-High>. Accessed: October 5, 2018.

<sup>18</sup> Education Data Partnership. [Online]: <http://www.ed-data.org/district/Shasta/Enterprise-Elementary>. Accessed: October 5, 2018.

County library branches. The Redding Branch library is the most recent library addition, having opened on March 3, 2007.

### **Streets and Roadways**

Local road maintenance of City streets would be provided by the City of Redding, Shasta County on County streets, and by Caltrans on state highways, funded by gas, property and sales taxes. The City is responsible for ensuring the construction and maintenance of all public streets, sidewalks, bridges, bikeways, traffic signals and street signage within the incorporated City limits. The City also maintains a variety of Caltrans facilities consistent with the terms of various cooperative agreements. Developers are either totally or partially responsible for new street construction, depending on the type and location a proposed project. In addition, traffic impacts fees are paid at occupancy. The City uses public funds and impact fees to build or improve major streets when past development did not make these improvements as part of their projects. With regards to Henderson Road (North) and Parkview Avenue (South) the existing pavement condition is rated as “very poor” and “poor”, respectively.<sup>19</sup>

### **Transit Services**

Existing transit service is provided primarily by the Redding Area Bus Authority (RABA). RABA provides fixed route service, express route service and demand response service to the general public within the urbanized area of Shasta County. The proposed project is located along RABA Route 5, a route serving shopping and employment areas and residential neighborhoods along Hartnell Avenue, Bechelli Lane, and Cypress Avenue, in addition to downtown Redding.<sup>20</sup> Route 5, which originates and terminates at the Downtown Transit Center, provides bus stops at the Sequoia Middle School, Village Plaza Shopping Center, Parsons Junior High School, and Alta Mesa Elementary School. The nearest Route 5 bus stop is located on the west side of Hartnell Avenue, south of Henderson Road, approximately 200 feet from the proposed project.

## **5.12.2 REGULATORY SETTING**

This section summarizes the laws, ordinances, regulations, and standards that are applicable to the project. The following is a description of State and local environmental laws and policies that are relevant to the California Environmental Quality Act (CEQA) review process.

### **STATE**

#### **California Building Standards Code**

The California Building Standards Code (CBC)—Part 2 of Title 24 of the California Code of Regulations—identifies building design standards, including those for fire safety. The CBC is based on the Uniform Building Code but has been modified for California conditions. It is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. Commercial and residential buildings are plan-checked by local city and county building officials for compliance with the CBC. Typical fire safety requirements of the CBC include the installation of sprinklers in multifamily buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

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<sup>19</sup> City of Redding. Letter from John Abshire, Assistant Director of Public Works. September 14, 2018.

<sup>20</sup> Redding Area Bus Authority. 2014. *Final Short-Range Transit Plan*. Page 4-5. June 2014.

## California Fire Code

The California Fire Code (CFC)—Part 9 of Title 24 of the California Code of Regulations—incorporates by adoption the International Fire Code of the International Code Council, with California amendments. The CFC regulates building standards in the CBC, fire department access, fire protection systems and devices, fire and explosion hazards safety, hazardous materials storage and use, and standards for building inspection. The CFC is updated and published every three years by the California Building Standards Commission. The 2016 CFC took effect on January 1, 2017.

## Senate Bill (SB) 50

The Leroy F. Greene School Facilities Act of 1998, or Senate Bill 50 (SB 50), authorizes school districts to levy developer fees to finance the construction or reconstruction of school facilities. In January 2018, the State Allocation Board (SAB) approved maximum Level 1 developer fees at \$0.61 per square foot of enclosed and covered space in any commercial or industrial development, and \$3.79 per square foot for residential development (State Allocation Board [SAB], 2018). These fees are intended to address the increased educational demands on the school district resulting from new development. Public school districts can, however, impose higher fees than those established by the SAB, provided they meet the conditions outlined in the act. Private schools are not eligible for fees collected pursuant to SB 50.

The payment of school mitigation impact fees authorized by SB 50 is deemed to provide full and complete mitigation of project impacts on school facilities. SB 50 provides that a State or local agency may not deny or refuse to approve the planning, use, or development of real property on the basis of a developer's refusal to provide mitigation in amounts in excess of that established by SB 50.

## LOCAL

### City of Redding Municipal Code

RMC Title 9, *Health and Safety*, Chapter 9.20, *Fire Code*, provides development standards for construction in a very high fire hazard severity zone as determined by the City of Redding Fire Department in conjunction with the California Department of Forestry and Fire Protection. RMC Title 13, *Streets and Sidewalks*, provides construction standards and long term maintenance provisions for new streets within the City.

### City of Redding General Plan

The elements within the City of Redding *General Plan* provide goals, policies, and implementation measures in order to reduce impacts of projects on public services and utilities. Applicable goals relative to the proposed Project site within these elements are listed in Table 5.12-2, CONSISTENCY WITH APPLICABLE CITY OF REDDING GENERAL PLAN GOALS AND POLICIES FOR PUBLIC SERVICES, below, followed by a brief explanation of how the proposed project complies with the goals and policies.

**Table 5.12-2  
CONSISTENCY WITH APPLICABLE CITY OF REDDING GENERAL PLAN GOALS AND POLICIES FOR PUBLIC SERVICES**

General Plan Goals and Policies	Consistency Analysis
<b>GENERAL PLAN GOAL PF2</b>	
<i>ENSURE A HIGH LEVEL OF POLICE PROTECTION FOR THE CITY'S RESIDENTS, BUSINESSES, AND VISITORS.</i>	
<b>Policy PF2A:</b> Establish the following thresholds for police services: 1) Maintain, at minimum, a sworn officer to population ratio of 1.36 officers per 1,000 residents; 2) Respond to 85 percent of Priority 1 calls within 5 minutes of being dispatched.	<b>Consistent.</b> The proposed project would not result in a potentially significant increase in population, nor would it result in a substantial increase in calls for police service. Refer to Impact 5.12-1, below, for further detail.
<b>Policy PF2B:</b> Provide police facilities (including patrol and other vehicles, necessary equipment, and support personnel) sufficient to maintain the City's standards for law enforcement services.	<b>Consistent.</b> The proposed project would not result in a potentially significant increase in population, nor would it result in a substantial increase in calls for police service. The City Council determines on an annual basis the funding for all City services based upon the budgets submitted by each department and the monies available. Refer to Impact 5.12-1, below, for further detail.
<b>GENERAL PLAN GOAL PF4</b>	
<i>ENSURE ADEQUATE FIRE PROTECTION AND EMERGENCY MEDICAL RESPONSE FOR RESIDENTS AND BUSINESSES IN THE COMMUNITY.</i>	
<b>Policy PF4A:</b> Establish the following thresholds for fire protection services: 1) Maintain a community ISO rating of 3 or better; 2) Respond to 90 percent of all calls within 5 minutes of being dispatched.	<b>Consistent.</b> The current RFD ISO rating is 2. The proposed project is within RFD Fire Station 5 and Fire Station 1 response areas and according to RFD staff, has the capacity to provide adequate fire protection services to the area upon project completion. Refer to Impact 5.12-1, below, for further detail.
<b>Policy PF4B:</b> Endeavor to maintain the minimum response time for fire calls through adequate staffing, proper distribution of fire stations and equipment, and use of automatic aid agreements.	<b>Consistent.</b> The RFD assumes a 5 percent increase in calls per year. The proposed project would not result in a potentially significant increase in population, nor would it result in an increase in calls beyond the assumed 5 percent increase. Therefore, the proposed project would not result in the need for an increase in fire services and therefore would not result in the need for additional staffing or equipment. Refer to Impact 5.12-1, below, for further detail.
<b>Policy PF4C:</b> Construct new and possibly relocate existing fire stations as needed to maintain service thresholds.	<b>Consistent.</b> The proposed project would not result in exceedance of the RFD thresholds for response time and would not require additional staffing or equipment. The proposed project would comply with fire safety standards and requirements as approved by the RFD. Therefore, the proposed project would not result in the need for a new or relocated station. Refer to Impact 5.12-1, below, for further detail.
Source: City of Redding. 2000 – 2020 General Plan. October 2000.	

**City of Redding Local Hazard Mitigation Plan**

The City of Redding Local Hazard Mitigation Plan (LHMP) (November 2015) includes resources and information to assist in planning for hazards. The plan provides a list of actions that may assist the City of Redding in reducing risk and preventing loss from future hazard events. The actions address hazards, as well as specific activities for, Wildland Fire, Flood, Hazardous Material, Severe Winter Weather, Earthquakes, Utility Disruption, Aviation Disaster, Chemical, Biological, Radiological, Nuclear, Explosives (CBRNE), Dam Overflow or Failure, and Volcanic issues. The purpose of hazard mitigation is to implement and sustain actions that reduce vulnerability and risk from hazards or reduce the severity of the effects of hazards on people and property. Refer to Section 5.5, GEOLOGY AND SOILS, and Section 5.7, HAZARDS AND HAZARDOUS MATERIALS.



### 5.12.3 STANDARDS OF SIGNIFICANCE

#### SIGNIFICANCE CRITERIA

In accordance with State *CEQA Guidelines*, the effects of a project are evaluated to determine whether they would result in a significant adverse impact on the environment. An EIR is required to focus on these effects and offer mitigation measures to reduce or avoid any significant impacts that are identified. The criteria used to determine the significance of impacts may vary depending on the nature of the project. The following significance thresholds related to population and housing have been derived from Appendix G of the State *CEQA Guidelines*:

- *Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities and/or result in the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts to maintain acceptable service ratios, response times, or other performance objectives for any of the public services, which include (refer to Impact 5.12-1 and Impact 5.12-2, below):*
  - *Fire Protection*
  - *Police Protection*
  - *Schools*
  - *Parks (refer to Section 5.13, RECREATION, for the discussion and evaluation of parks and recreation facilities).*
  - *Other Public Facilities*

Based on these standards, the effects of the proposed project have been categorized as either a less than significant impact or a potentially significant impact. Mitigation measures are recommended for potentially significant impacts. If a potentially significant impact cannot be reduced to a less than significant level through the application of mitigation, it is categorized as a significant and unavoidable impact.

### 5.12.4 POTENTIAL IMPACTS AND MITIGATION MEASURES

#### METHODOLOGY

Evaluation of potential police protection service, fire service and school impacts of the proposed project was principally based on consultation with the City of Redding Police Department, City of Redding Fire Department, local school districts, as well as a review of the City's *General Plan*.

Note that consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4<sup>th</sup> 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on public safety services are not an environmental impact that CEQA requires a project applicant to mitigate: "(T)he obligation to provide adequate fire and emergency medical services is the responsibility of the city. (Cal. Const., art. XIII Sec. 35, subd. (a)(2) "The protection of the public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services.)) The need for additional fire protection services is not an environmental impact that CEQA requires a project proponent to mitigate."

Public service impacts are analyzed below according to topic. Mitigation measures directly correspond with an identified impact.

**IMPACT**  
5.12-1

***The proposed project could result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities and/or result in the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts to maintain acceptable service ratios, response times, or other performance objectives for any of the public services, which include fire protection, police protection, schools, and parks.***

**Significance: Less Than Significant Impact.**

**Impact Analysis:** The following analysis addresses potential impacts on fire and police services and protection; schools, and other public facilities associated with construction of new or physically altered facilities, the need for which would be generated by implementation of the proposed project.

**Short-Term Construction**

The proposed project would include a temporary (two-year period) influx of construction workers into the area during the construction phase. The City requires a Traffic Management Plan (TMP) to ensure proper coordination during construction. The increase in temporary construction personnel could also result in an increase in service demands on public services. However, these increases during construction would be temporary in nature and are not anticipated to result in a substantial increase that would result in the need for altering existing facilities or the need for new facilities. Short-term construction impacts are *less than significant* regarding the increase in demand on public services.

**Long-Term Operation**

As discussed in Section 5.11, POPULATION AND HOUSING, the proposed project would require approximately 180 full time employees. Based on a 2.38 average household size for Redding, the addition of 180 full time employees would potentially increase the City of Redding population by 428 persons, assuming all employees would relocate from outside the local area with families. Based on the most recent available data, the current population of the City of Redding is 91,357 and Shasta County is 178,271 (DOF, 2018). The potential increase of 428 residents would represent a 0.4 percent increase in the current population for the City and a 0.2 percent increase for the current population for the County as a whole.

**Fire Protection.** For planning purposes, the RFD assumes a five percent increase in calls per year. The proposed project is within RFD Fire Station 5 and Fire Station 1 response areas and according to RFD staff, has the capacity to provide adequate fire protection services to the area upon project completion.<sup>21</sup> The RFD has fire protection requirements and standards for new development projects, including standards for defensible space, hydrant spacing, fire flow, access and roadway requirements, and limitations on building materials, as well as requiring adequate roadway widths. The City Fire

<sup>21</sup> City of Redding Fire Department. *Response to Fire Service Questionnaire*.

Marshall reviews all projects wherein an entitlement is being sought by the City (maps, use permits, etc.) prior to any building permit approval of construction for compliance with State and local requirements.

As a part of the approval process, the proposed project would be required to conform to the *Uniform Fire Code* and local amendments; Title 19, 22, and 27 of the *California Safety Code Regulations* and the *National Fire Prevention Association Standards*. These codes require projects to include specific design features such as ensuring appropriate emergency access and requiring structures to be built with approved building materials, etc. Conformance with these codes helps reduce the risks associated with fire hazards. Accordingly, all construction plans would be approved by the RFD to ensure that all fire code requirements are incorporated into the proposed project.

The provision of new or physically altered fire facilities is not associated with providing service to the proposed project. It should be noted, however, that compliance with fire safety standards and requirements such as interior sprinkler systems, fire alarms, emergency access, and adequate fire flow that would be verified during the building permit plan check process would reduce fire protection impacts and in turn, any immediate need for new or physically altered fire facilities. Fire protection impacts are *less than significant*.

**Law Enforcement Services.** As mentioned above, RPD average response times have increased and vary greatly depending on the type of call for service. The RPD averages 270 calls for service per day, approaching 100,000 calls for services for the year (2017). The RPD found that the majority of the increase in calls is due to the criminal justice system changes from AB 109 (prison realignment) and Proposition 47.<sup>22</sup> The calls for service in the area of the proposed project are primarily due to activities associated with transient population.<sup>23</sup>

Police services are monitored by the City Council on a regular basis. If additional services are need, the City Council will allocate resources to address the need as funding is identified. There is nothing unique about the proposed project that would require significantly greater law enforcement service or result in a need for new facilities. The RPD does not anticipate that the proposed project will cause a substantial increase in calls for service.<sup>24</sup> It should be noted, however, that compliance with basic safety and security measures (i.e., well maintained and well-lit parking areas and onsite security cameras) would help to reduce incidents requiring law enforcement involvement. The provision of new or physically altered law enforcement facilities is not associated with providing service to the proposed project. The proposed project would not result in the need to alter or construct facilities for law enforcement services, thus impacts are *less than significant*.

**Schools.** The proposed project would not result in the construction of new residential uses; therefore, the proposed project would not directly require the construction of additional school facilities and/or expansion of existing school facilities. However, the addition of 180 full time employees would potentially increase the City's population by 428 persons (0.4 percent increase). With the proposed project contributing up to 180 new employees (households) and utilizing a factor of 1.01<sup>25</sup> average number of children per family, the increase in population would result up to 182 new school age children.

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<sup>22</sup> City of Redding Police Department. *Response to Law Enforcement Questionnaire*. July 5, 2018.

<sup>23</sup> City of Redding Police Department. *Email Correspondence*. June 12, 2019.

<sup>24</sup> Ibid.

<sup>25</sup> US Census Bureau. 2018. *Table ST-F1-2000. Average Number of Children Per Family and Per Family With Children, by State: 2000 Census*.

Developer fees for residential and commercial construction are collected by the Shasta County Office of Education (SCOE) on behalf of the school districts of Shasta County. The fees collected are used by the districts for construction and reconstruction of school facilities and may be used to pay bonds, notes, loans, leases or other installment agreement for temporary and permanent facilities. For 2018/2019, school fees are assessed at and \$0.61 per square foot for commercial/industrial construction.<sup>26</sup>

Based on the estimated square footage, the proposed project would generate approximately \$79,056 in school impact fees. These fees are collected at the building permit stage. The payment of school fee is consistent with Section 65995(3)(h) of the California Government Code and is considered adequate mitigation for indirect impacts on school facilities and potential impacts are considered *less than significant*.

**Other Public Services.** Other public services include libraries, roadway maintenance and transit services. The following discussion evaluates the proposed project's impact on these other public services.

- **Library Services.** As discussed above, the Shasta County Library system consists of three libraries throughout Shasta County with the closest branch being the Redding Branch Library located approximately 1-mile west of the proposed project. It is not reasonably foreseeable that the estimated increased population of up to 428 new residents would result in a direct need for a new library because the Redding Branch Library is located centrally within the City, a reasonable driving distance from most locations within the City. Impacts would be *less than significant*.
- **Roadway Maintenance.** The proposed project is required to construct roadway improvements consistent with RMC Title 13, *Streets and Sidewalk*, along Parkview Avenue (Open Space Access) (approximately 9,000 square feet) and other offsite traffic mitigation to accommodate additional project generated traffic (refer to Section 5.14, TRAFFIC AND CIRCULATION, for a detailed discussion of proposed traffic mitigation). Additionally the City maintains approximately 57,000 square feet of existing pavement along project frontages (i.e., Henderson Road (North), Henderson Road (South), and Parkview Avenue (South)). Pavement conditions along these roads are considered "poor" to "very poor."

The type of maintenance required on the street network that includes Henderson Road (North), Henderson Road (South), and Parkview Avenue (South) would include crack sealing, slurry sealing, selective removal and replacement of failed sections of asphalt, up to and including total re-construction. The City's Streets Maintenance Division receives funding from the City's General Fund. The City Council determines on an annual basis the funding for all City services based upon the budgets submitted by each department and the monies available. With the proposed project's improvements of street widening, paving and repaving, lane striping, curb, gutters, and sidewalks, the City does not anticipate any significant impacts on current roadway maintenance around the project area.<sup>27</sup> Impacts would be *less than significant*.

- **Transit Service.** As discussed in Section 3.0, PROJECT DESCRIPTION, and in Section 5.14, TRAFFIC AND CIRCULATION, existing transit service is provided primarily by RABA. Route 5, which originates and terminates at the Downtown Transit Center, provides bus stops at the Sequoia

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<sup>26</sup> Shasta County Board of Education. 2018. [Online]: <https://www.shastacoe.org/administrative-services-division/business-services/developer-fee-services>. Accessed: October 8, 2018.

<sup>27</sup> City of Redding. Letter from John Abshire, Assistant Director of Public Works. September 14, 2018.

Middle School, Village Plaza Shopping Center, Parsons Junior High School, and Alta Mesa Elementary School. The nearest Route 5 bus stop is located on the west side of Hartnell Avenue, south of Henderson Road, approximately 200 feet from the proposed project.

According to Figure 4-19, *RABA – Shasta Lake to Redding (Daily Boardings by Stop)*, bus stop locations along Hartnell Avenue (between Cypress Avenue and Bechelli Lane), within the vicinity of the proposed project are identified as having between 1 and 5 passenger boardings per day, the lowest reporting category for passenger boardings.<sup>28</sup> In addition, the average route productivity<sup>29</sup> for RABA (2013) was 19.8 passengers per hour. Route 5 (FY 2012/2013) was reported to operate below RABA’s 19.8 productivity average, with an average of 16.34 passengers per hour.<sup>30</sup> In contrast, the highest productivity route in the system is Route 14 with an average of 35.9 passengers per hour.<sup>31</sup>

Development of the proposed project could potentially increase RABA ridership; however, development of this project alone would not result in an increase in demand that would create a significant impact that would necessitate changing current transit operation or require new bus stop locations. As noted above, Route 5 in general maintains ridership levels below RABA averages. In addition, RABA has reviewed the proposed project and has determined that a new bus turnout is not required. Impacts would be *less than significant*.

**Mitigation Measures:** No mitigation measures are required.

**Level of Significance After Mitigation:** No mitigation measures are required. Impacts would be *less than significant*.

### 5.12.5 CUMULATIVE SETTING, IMPACTS, AND MITIGATION MEASURES

The analysis of cumulative impacts focuses on those effects that, when combined together with other similar activities or projects could result in a large enough effect or impact that would be considered cumulatively significant. If the individual project’s contribution is substantial enough, it may be considered cumulatively significant. In some instances, a project-specific impact may not combine with effects from other activities, in which case, the project’s contribution to a cumulative effect would be less than considerable.

The geographic areas considered for cumulative impacts are the respective services areas of the City of Redding, Redding Fire Department and Redding Police Department, including the geographic area covered by SHASCOM, the Shasta Unified High School District and the Enterprise Elementary School District. This geographic extent is appropriate as service providers are responsible for ensuring adequate provision of public services within their service area boundaries.

**IMPACT**  
5.12-2 *Implementation of the proposed project, combined with other past, present, and reasonably foreseeable future development, could increase the demand for public services.*

<sup>28</sup> Redding Area Bus Authority. 2014. *Final Short-Range Transit Plan*. Page 4-24. June 2014.

<sup>29</sup> Productivity in a fixed route system is typically measures by the number of boardings per hour of service.

<sup>30</sup> Redding Area Bus Authority. 2014. *Final Short-Range Transit Plan*. Page 4-29. June 2014.

<sup>31</sup> Ibid.

**Significance: Less Than Significant Impact.**

**Impact Analysis:** As previously identified, police and fire, protection is provided by the City of Redding police and fire departments. In emergencies, additional personnel are available due to mutual aid agreement with the County Fire and Sheriff's Department, CAL FIRE, and CHP.

Significant cumulative impacts on public services could occur if the public agencies are overburdened or unable to provide adequate services, thereby resulting in significant combined impacts related to the development of new facilities. As described in Impact 5.12-1, because the proposed project would induce less than a one percent population growth in the area, implementation would not result in the need to construct new, or physically alter or expand existing public services such as law enforcement and fire protection facilities, schools, and libraries. In addition, the project would not impede the effective operation of any existing law enforcement and fire facilities, school, or library. Therefore, the proposed project's incremental contribution to this impact is not cumulatively considerable.

Plans for adequately providing public services to future development are generally prepared based on land use development plans and trends, and reflect anticipated growth in the region. While cumulative projects could increase the demand for public service providers, public agencies, through the development review process have the opportunity to respond to an inquiry for information regarding potential increase in demand on their services. Each individual project would also be required to comply with federal, State, and local health and safety regulations, hazardous materials business plans (if necessary), development standards, building codes, and other laws and regulations that govern fire protection and security risks. In addition, each individual project would be assessed for development fees for law enforcement, fire protection, schools, parks, and other public services for the construction and maintenance of facilities but not for operational costs. Therefore, impacts from the proposed project, in conjunction with other projects in the area, are considered to be cumulatively *less than significant*.

**Mitigation Measures:** No mitigation measures are required.

**Level of Significance After Mitigation:** No mitigation measures are required. Impacts would be cumulatively *less than significant*.