

5.12 Public Services

5.12.1 INTRODUCTION

This section of the Draft EIR addresses impacts of the Project to public services, including fire protection and emergency services, police protection, school services, park services, and other public services, such as library and health services. This section addresses whether there are physical environmental effects of new or expanded public facilities that are necessary to maintain acceptable service levels. This section analyzes whether any physical changes resulting from a potential increase in service demands from Project implementation could result in significant adverse physical environmental effects. Thus, an increase in staffing associated with public services, an increase in calls for services, would not, by itself, be considered a physical change in the environment. However, physical changes in the environment resulting from the construction of new facilities or an expansion of existing facilities to accommodate the increased staff or equipment needs resulting from the Project could constitute a significant impact. The analysis in this section is based, in part, on the following documents and resources:

- *City of Redlands General Plan 2035, December 5, 2017;*
- *City of Redlands General Plan Update and Climate Action Plan Environmental Impact Report (General Plan EIR), Dyett & Bhatia, July 2017; and*
- *City of Redlands Municipal Code.*

5.12.2 REGULATORY SETTING

5.12.2.1 Federal Regulations

There are no Federal regulations pertaining to public services that would be applicable to the Project.

5.12.2.2 State Regulations

California Building Code

The California Building Code (CBC) includes fire safety requirements, including the installation of sprinklers in all commercial and residential buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

California Fire Code

California Code of Regulations (CCR) Title 24, Part 9 (2016 California Fire Code) contains regulations relating to construction and maintenance of buildings, the use of premises, and the management of wildland-urban interface areas, among other issues. The California Fire Code is updated every three years by the California Building Standards Commission and was last updated in 2016 (adopted January 1, 2017).

The Fire Code sets forth regulations regarding building standards, fire protection and notification systems, fire protection devices such as fire extinguishers and smoke alarms, high-rise building standards, and fire suppression training. It contains regulations relating to construction, maintenance, and use of buildings. Topics addressed in the code also include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire-

safety requirements for new and existing buildings and the surrounding premises. Development under the Project would be subject to applicable regulations of the California Fire Code.

Mitigation Fee Act (California Government Code Sections 66000 et seq.)

Enacted as Assembly Bill (AB) 1600, the Mitigation Fee Act requires a local agency, such as the City of Redlands to establish, increase, or impose an impact fee as a condition of development to identify the purpose of the fee and the use to which the fee is to be put. The agency must also demonstrate a reasonable relationship between the fee and the purpose for which it is charged, and between the fee and the type of development Project on which it is to be levied. This Act became enforceable on January 1, 1989 (California Legislative Information, 2019).

Quimby Act

The Quimby Act (California Government Code, Section 66477) was established by the California legislature in 1965 to develop new or rehabilitate existing neighborhood or community park or recreation facilities. This legislation was enacted in response to the need to provide parks and recreation facilities for California's growing communities. The Quimby Act gives the legislative body of a city or county the authority, by ordinance, to require the dedication of land or payment of in-lieu fees, or a combination of both, for park and recreational purposes as a condition of approval of a tract map or parcel map.

5.12.2.3 Local Regulations

Fire Protection and Emergency Services

City of Redlands General Plan

The Livable Community Element, Connected City Element, and Healthy Community Element of the General Plan set forth the following actions and principles for fire protection and emergency services:

Principle 4-P.30. Require that new development adheres to safety standards to protect against property damage, injury, or loss of life from fire or geological hazards.

Principle 5-P.7. Minimize emergency vehicle response time and improve emergency access.

Action 5-A.3. Ensure new street design and potential retrofit opportunities for existing streets minimize traffic volumes and/or speed as appropriate within residential neighborhoods without compromising connectivity for emergency vehicles, bicycles, pedestrians, and users of mobility devices. This could be accomplished through:

- Management and implementation of complete street strategies, including retrofitting existing streets to foster biking and walking as appropriate;
- Short block lengths, reduced street widths, and/or traffic calming measures; and
- Providing pedestrians and bicyclists with options where motorized transportation is prohibited.

Action 5-A.15. Maintain access for emergency vehicles and services by providing two means of ingress/egress into new communities, limitations on the length of cul-de-sacs, proper roadway widths and road grades, adequate turning radius, and other requirements per the California Fire Code.

Policy 7-P.12. Create and maintain a system of trails serving both recreational and emergency access needs.

Action 7-A.96. Ensure that all-weather access is provided for all new development, with adequate clearance for emergency vehicles, designed in accordance with the California Fire Code, and ensure that all roads, streets, and major public buildings are identified in a manner that is clearly visible to fire protection and other emergency vehicles.

City of Redlands Fire Fees

The Project is required to comply with the provisions of the City of Redlands Fire Department Fees (Resolution No. 8045), which requires a fee payment for any developments requiring permitting that the City applies to the funding of fire protection facilities.

Police Services

City of Redlands General Plan

The Livable Community Element of the General Plan sets forth the following actions and principles for police services:

Principle 4-P.60. Locate police and fire resources where they can best serve the community.

Principle 4-P.61. Support community partnership and community-based policing strategies to enhance the relationship between the Redlands Police Department and neighborhoods throughout the city.

Action 4-A.153. Ensure that the Police and Fire departments have modern facilities and equipment needed to perform their duties.

Action 4-A.154. Support and expand neighborhood watch organizations and citizen volunteer patrols to assist the police in deterring crime.

Action 4-A.155. Continue to enact mutual aid agreements with neighboring police and fire jurisdictions as well as state agencies.

Action 4-A.156. Encourage the use of police substations throughout the city to increase the police presence in the neighborhoods.

Action 4-A.157. Include the Police and Fire departments in the review of new developments to provide feedback on building and site design safety.

Park Services

City of Redlands General Plan

The Healthy Community Element of the General Plan sets forth the following actions and principles promoting park and recreation facilities and programs:

Principle 7-P.1. Promote active lifestyles and community health by furthering access to trails, parks, public open space, and other recreational opportunities.

5.1 2.3 ENVIRONMENTAL SETTING

Redlands Fire Department

The Redlands Fire Department (City Fire) would serve the TVSP area. City Fire provides fire suppression, emergency medical services (paramedic and non-paramedic), ambulance services, hazardous materials (HAZMAT) response, arson investigation, technical rescue, winter rescue operations, hazard abatement, and terrorism and weapons of mass destruction. The Fire Department provides services including fire prevention and suppression, emergency medical services, technical rescue, and hazardous materials response.

According to the Redlands General Plan EIR, the Redlands Fire Department recognizes two response time standards. The two standards include the National Fire Protection Association (NFPA), which recommends that the first arriving unit arrive within four minutes 90 percent of the time, and a more lenient goal of seven minutes 90 percent of the time, as recommended by the 2008 High-Level Fire Department Review for the Redlands Fire. According to the City of Redlands, the current 90 percent response time is nine minutes, which is over twice the NFPA standard and two minutes slower than the more lenient guideline.

The Fire Department consists of approximately 52 total sworn personnel, (including 44 firefighter/paramedics and 16 firefighter/EMTs) and covers an area of 37 square miles. In 2021, RFD received 11,836 calls for service and had 72,933 residents (California Department of Finance), which results in 0.16 calls per resident. The calls for service increased by an average by 6.65 percent in the three years between October 2016 and September 2019. Additionally, approximately 45 percent of the calls for service occur simultaneously. A majority of the increased calls were for emergency medical services (Citygate), which is consistent with the City's Fire Department Assessment and Deployment Study (2020) that details that 63 percent of service calls in 2018/2019 were for emergency medical services. The RFD currently has a goal response time of 7 minutes, 90 percent of the time (Citygate, 2020). The TVSP area would be served by four fire stations as shown in Table 5.12-1 below. The City currently has plans to acquire sites for and to construct two new fire stations (Stations 265 and 266) in different parts of the City and relocate Station 264 based on the annual increase in calls for service and location of service need.

Table 5.12-1: Fire Stations

Fire Station	Location
Station 261	525 East Citrus Avenue
Station 264	1270 West Park Avenue
Station 262	1690 Garden Street
Station 263	10 West Pennsylvania Avenue

Source: City of Redlands Fire Department 2022

Redlands Police Department

Public safety services in the City, including the TVSP area, are provided by the Redlands Police Department (RPD). RPD's main police station is located at 1270 West Park Avenue within the boundaries of the New York Street/Esri Transit Village. There are four other divisions located citywide. The Police Department personnel is made up of approximately 100 volunteers, 80 sworn officers and 58 full and part-time civilians, resulting in a service level of 1.12 officers per 1,000 residents. In 2020, the Department had an average response time of 9.08 minutes for Priority one police service calls and a service ratio of 1.1 officers per 1,000 residents. Although there are no industry standards for response time to emergency calls, according to the Redlands Police Department, a response time of 4.5 minutes is desirable in a city of this size. Table 5.12-2 below shows the location and staffing descriptions of the stations within the City.

Table 5.12-2: Police Stations

Location	Staffing Description
1270 W. Park Avenue	Patrol, Custody, Dispatch Records
30 Cajon Street	Administration, Investigations, MET, Traffic/Special Events, Crime Analysis, Community Policing, Property/Evidence
1150 Brookside Avenue	Records Processing
111 W. Lugonia Avenue	Community Policing Officer
504 Kansas Street	Animal Control Office

Source: RPD, 2022

Park Services

Existing parks within the City include four pocket parks (1.8 acres), eight neighborhood parks (76.8 acres), six community parks (143.2 acres), and three other parks (202.4 acres) for a total of approximately 424.2 acres (GP2035 EIR, Table 3.13-1). At the estimated 2019 population of 71,513 residents, the ratio of existing parkland acres per 1,000 residents is 5.9, which exceeds the GP2035's parkland/recreational space standard of 5.0 acres per 1,000 residents consistent with state law (Quimby Act). Table 5.12-3, *Existing Parks within the Project Area*, shows the existing parks within the TVSP area as well as additional park information.

Table 5.12-3: Existing Parks within the TVSP Area

Park Type	Park Name	Location (in Redlands)	Park Size	Park Details
Pocket Park	Ed Hales Park	101 E. State St.	0.7 acre	Picnic facilities in the downtown central business district
Neighborhood Park	Smiley Park (Portion)	126 E. Eureka St.	9.2 acres (Only a portion located within TVSP area)	Located at the Redlands Civic Center, this park is home to A. K. Smiley Public Library, the Lincoln Memorial Shrine, and the Redlands Bowl
	Jennie Davis Park	923 W. Redlands Blvd.	5.2 acres	Playground facilities and location of the annual Veteran's Day Parade and Celebration
Community Park	Sylvan Park	University St. between Colton Ave. and Park Ave.	23.3 acres	Open grassy areas, rose garden, picnic areas, a playground, a stage/bandstand area, a skate park, a baseball/softball field, horseshoe pits, bag toss, lawn bowling, and trails.
Other Park	Terrace Park	Between N. Sixth St. and Church St. on Colton Ave.	2.4 acres	Linear park featuring landscaped tree-lined walkway with benches and drinking fountain

Source: City of Redlands, Facilities & Community Services Department, <https://www.cityofredlands.org/parks>, accessed March 2022.

Other Public Services

Other governmental services include the City's library system. The A. K. Smiley Public Library, established in 1894, is a 34,000-square-foot facility located at 125 West Vine Street. In addition to its diverse collection of resource materials, the library system offers services and programs for all ages, including an adult literacy program. It also houses a museum, and the Lincoln Memorial Shrine. At the time the GP2035 was drafted, the library was in need of additional storage space for the museums, and plans were underway for an

adjunct building at 700 Brookside Avenue (formerly the Redlands Daily Facts building) for the Redlands Historical Museum (GP2035 EIR, p. 3.13-13).

5.12.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 public services:

- PS-1 – Fire protection
- PS-2 – Police protection
- PS 3 – Schools
- PS 4 – Parks
- PS 5 – Other public facilities

The Initial Study established that the proposed Project would not result in impacts related to Threshold PS-3; and no further assessment of this impact is required in this Draft EIR.

5.12.5 METHODOLOGY

The evaluation of impacts to public services is based on whether the existing public service can meet the demands of the Project, based on established thresholds, including maintaining acceptable service ratios, staffing levels, adequate equipment, response times, and other performance objectives that results in the need for new or the expansion of existing government services and facilities, including fire and police stations, schools, parks, libraries, community recreation centers, public health facilities, and animal shelters, that would result in significant adverse physical effects on the environment.

5.12.6 ENVIRONMENTAL IMPACTS

IMPACT PS-1: THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE CONSTRUCTION OR EXPANSION OF FIRE FACILITIES.

Less than Significant Impact. Full buildout of the TVSP area pursuant to the TVSP would increase the demand for fire protection and emergency medical services. The threshold is whether the Project would result in inadequate staffing levels or require additional equipment, response times, and/or increase the demand for services that would then require the construction or expansion of fire station facilities that would have an adverse physical effect on the environment.

Development within the TVSP area would be installed with fire extinguishers, wet and dry sprinkler systems, pre-action sprinkler systems, fire alarm systems, fire pumps, backflow devices, and clean agent waterless fire suppression systems pursuant to the California Fire Code adopted as Chapter 15.20 of the Redlands Municipal Code, CBC, and other existing regulations regarding fire safety. Site access would be reviewed by City planning and the Redlands Fire Department to ensure that the proposed improvements would have adequate access for large fire trucks and vehicles. Future development within the TVSP would be required to meet fire and life safety standards, including smoke and carbon monoxide detectors, fire alarms, and residential fire sprinklers, among other building requirements. Their development plans would also be reviewed by City planning and fire departments to ensure state and county codes and requirements are implemented.

The General Plan EIR stated that the fire services have stated the needs for expansion in order to accommodate continued increase in population. However, development impact fees included as PPP PS-1

would serve to ensure the maintenance of existing facilities and the timely provision of new facilities as needed. The fees collected would ensure the level of fire protection services are maintained and can be applied to the purchase of equipment, maintenance of existing facilities, and the construction of additional facilities, if needed in the future. Furthermore, future developments pursuant to the TVSP would be required to meet fire and life safety standards, including smoke and carbon monoxide detectors, fire alarms, and residential fire sprinklers, among other building requirements. Their development plans would also be reviewed by City planning and fire departments to ensure state and City codes and requirements are implemented.

Whether the City chooses to construct new fire stations in the future is too speculative to be considered as a Project-related impact. Any potential improvements would be subject to City policies that are designed to protect environmental resources as well as environmental review under CEQA, separate from this Project. Therefore, with the payment of development fees included as PPP PS-1, Project impacts to fire services would be less than significant.

IMPACT PS-2 THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE CONSTRUCTION OR EXPANSION OF NEW OR PHYSICALLY ALTERED POLICE FACILITIES.

Less than Significant Impact. The service ratio for the City of Redlands is 1.1 officers per 1,000 residents. Based on the new resident population of 6,360, the City would need to hire approximately 7 new officers to maintain the service ratio in the City. The increased residential population and increased commercial uses from buildout of the TVPS could increase the frequency of emergency and non-emergency calls to the Redlands Police Department, as compared to existing conditions. Buildout of the TVSP is not expected to increase demand for police protection to the extent that new facilities would be required. However, payment of development impact fees included as PPP PS-1 would serve to ensure the maintenance of existing facilities. In addition, property tax revenue generated by development of the Project would provide funding for police services and would help to offset the Project's increase in the demand for services. Therefore, impacts to police protection facilities would be less than significant.

IMPACT PS-4 THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE CONSTRUCTION OR EXPANSION OF NEW OR PHYSICALLY ALTERED PARK FACILITIES.

Less than Significant Impact. As discussed in Section 5.13, *Population and Housing*, full buildout of the TVSP would result in the generation of up to 6,360 residents. Without the development of new parks, this population increase would place additional physical demands on existing parks and recreational facilities, which could result in deterioration of existing facilities. The City of Redlands has a ratio of 5.9 acres of parkland per 1,000 residents which exceeds the state law requirement of 5.0 acres per 1,000 residents. As such, buildout of the TVSP would result in a demand for 31.8 acres of parkland. According to the City's General Plan Parks and Recreational Open Space Element (Section 7.2), there are several different kinds of parks in Redlands, including community parks, neighborhood parks, and pocket parks. As discussed in Table 5.12-3, there are 4 existing parks totaling 40.8 acres within the TVSP area. The TVSP area at full buildout would provide an additional 280,000 SF (6.4 acres) of open space and park area which would bring the City's total parkland acreage to 430.6 acres (not including any additional parkland that may be added in the future by the City outside the Project area).

Furthermore, the City's mechanism for addressing parkland needs are its development impact fees as set forth in RMC Chapter 3.32 included as PPP PS-2. The funds would be used to maintain and operate the existing park facilities and construct additional facilities, as deemed warranted by the City. Development impact fees are charged by local governments to defray all or a portion of the cost of public facilities

related to development projects. Any potential new facilities would be subject to the City's policies designed to protect environmental resources and environmental review under CEQA, which would be separate from this Project. Based on the TVSP's provisions for additional parkland and the existing parkland within the TVSP area and the incremental population increase resulting from buildout of the TVSP, the Project would not result in overuse of existing parks and facilities that would result in substantial deterioration of existing facilities. Additional City policies requiring maintenance and funding of existing and future recreational facilities would ensure that parks within the TVSP are in good physical condition. The development of future recreational facilities would be subject to existing building and construction regulations that would ensure that construction activities have a minimal effect on the surrounding environment. These, along with Redlands General Plan policies established to protect environmental resources, air quality, and water quality, would ensure that future park construction within the TVSP would have a less than significant impact.

IMPACT PS-5 THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH THE CONSTRUCTION OR EXPANSION OF NEW OR PHYSICALLY ALTERED PUBLIC FACILITIES.

Less than Significant Impact. Other public facilities and services provided by the City include library services and City administrative services. As with all developments, the Project would contribute to the incremental demand for expanded government services and facilities, including libraries, community recreation centers, public health facilities, and/or animal shelters. The policies set forth by the Redlands General Plan ensure that within the city these public services are improved and expanded to meet demand as development occurs within the TVSP area. Future development of new public facilities would require project-level environmental review and site-specific mitigation measures as appropriate, ensuring that adverse environmental effects are avoided or mitigated. Additionally, the Project would generate new tax revenues that would contribute to and supplement existing revenue sources for the maintenance and enhancement of these facilities. Therefore, Project implementation would not adversely affect public facilities or require the construction of new or modified public facilities that are not already addressed in this document. Impacts would be less than significant.

5.12.7 CUMULATIVE IMPACTS

The Project would not significantly increase the need for public services in Redlands, cities surrounding Redlands, or the region. As discussed above, the Project applicant would pay the required City Development Impact Fees and Park Fees included as PPP PS-1 and PPP PS-2. Additionally, as discussed above, the Project would not impact acceptable service ratios, staffing levels, adequate equipment, response times, and other performance objectives or if the result in the need for new or the expansion of existing government services and facilities. Related projects in the region would be required to demonstrate their level of impact on public services and also pay their proportionate development fees. Therefore, the past, present, and future projects would not result in a cumulative impact related to the provision of public services.

5.12.8 EXISTING REGULATIONS, STANDARD CONDITIONS, AND PLANS, PROGRAMS, OR POLICIES

Regulations

None.

Standard Conditions

None.

Plans, Programs, or Policies

PPP PS-1: Development Impact Fees. As a standard requirement for implementing projects within the TVSP area, and prior to issuance of any building permits for the implementing project, the project applicants/developers shall pay all applicable City of Redlands Development Impact Fees (DIF) pursuant to the Redlands Municipal Code and/or adopted fee schedules.

PPP PS-2: Park Fees. As a Condition of Approval for implementing projects within the TVSP area, the project applicants/developers shall pay applicable park related fees pursuant to Redlands Municipal Code Chapter 3.32.

5.12.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements Impacts PS-1, PS-2, PS-4, and PS-5 would be less than significant.

5.12.10 MITIGATION MEASURES

No mitigation measures are required.

5.12.11 LEVELS OF SIGNIFICANCE AFTER MITIGATION

Compliance with regulatory programs would reduce potential impacts related to public services to less than significant. Therefore, no significant unavoidable adverse impacts would occur.

REFERENCES

City of Redlands General Plan 2035. Accessed: <https://www.cityofredlands.org/post/planning-division-general-plan>

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