

## **6.5 PUBLIC SERVICES**

### **6.5.1 INTRODUCTION**

This section addresses potential environmental impacts associated with providing public services to the project. Analysis provided in this section is based on review of agency documents and consultation with local public services providers. In addition, information was obtained from the Municipal Services Study prepared for the project by Wood Rodgers (2005).

### **6.5.2 EXISTING SETTING**

#### **LAW ENFORCEMENT**

The project site is currently served by the Sacramento County Sheriff. The nearest sheriff's station is McClellan Station located at 6028 Price Avenue, McClellan, approximately 9 miles east of the project site. The McClellan Station is located within the Northwest Division which serves the communities of Antelope, Elverta, Foothill Farms, Garden Highway, McClellan Park, Natomas Industry, North Highlands, and Rio Linda in the northernwestern portions of Sacramento County. Public access to sheriff services is provided through the Northwest Service Center located at 7511 Watt Avenue in North Highlands, California.

If the project is approved by the City, the project site would be located within the City's jurisdiction and would be served by the Sacramento Police Department. The William J. Kinney Police Facility would serve the project site and it is located at 3550 Marysville Boulevard approximately 10 miles east of the project site. This station provides police protection services for the North Natomas community, which is located within Sector 1, District 10. Approximately 24 sworn officers, four non-patrol officers, three community service officers, one lieutenant, and one detective are dedicated to Sector 1 (Scruggs, pers. comm., 2005). The Sacramento Police Department proposes to construct a new police substation north of Del Paso Road between East Commerce Way and Natomas Boulevard, approximately 2 miles east of the project site. Details on the timing of construction of this substation are currently unknown.

The Sacramento Police Department does not have an adopted officer-to-resident ratio. The Sacramento Police Department uses a variety of data including geographic information system (GIS) based data, call and crime frequency information, and available personnel to rebalance its deployment on an annual basis to meet the changing demands of the city. Along with this, the Sacramento Police Department changes the size of patrol districts within four geographical patrol areas approximately every two years to reflect population growth, crime, and other factors which require boundary adjustments (City of Sacramento 2005). As of 2005, the Sacramento Police Department was funded for 1.7 officers per 1,000 residents (City of Sacramento 2005).

#### **FIRE AND EMERGENCY MEDICAL RESPONSE**

Although the project site is located in the unincorporated area of Sacramento County, the project site is currently served by the City of Sacramento Fire Department (SFD) via contract with County Board of Supervisors. Specifically, the project site is located within the North Natomas Fire Protection District, which contracted with the County of Sacramento since 1986. With implementation of the project, the project will detach from Natomas Fire Protection District. The City would provide fire protection and emergency response services to the project site. In total, the SFD currently has 587 employees, 31 fire companies, and 10 medic units housed in 23 stations. The nearest fire station to the project site is Fire Station 30, located at the northeast corner of Regency Park Circle and Club Center Drive approximately 3 miles east of the project site. The next closest station is Fire Station 3 located at 7208 West Elkhorn Boulevard approximately 4 miles west of the project site.

In 2003 (the most recent data available from SFD), the SFD responded to approximately 63,905 calls with the majority of calls for emergency medical service (43,308 calls or 68 percent of total). The SFD's optimal response

time for fire and emergency medical response is 4.5 minutes from the time a call is placed. Current fire and emergency medical response times for areas west of I-5, including the project area, are greater than 12 minutes from the time a call is placed (Wood Rodgers 2005). The City has planned, approved, and intends to construct a new fire station that would serve the project site and areas near the project site (Wood Rodgers 2005). This station would be located either in the northeast corner of the Northpointe subdivision (east of the project site) or would be located approximately 0.7 mile to the southeast of the project site within future developments in the North Natomas community (Wood Rodgers 2005). Timing of construction of this station is currently unknown.

## **SOLID WASTE**

Solid waste disposal services for residential households in the unincorporated areas of Sacramento County are provided by the Sacramento County Department of Waste Management and Recycling. The Sacramento County Department of Waste Management and Recycling is responsible for maintaining a waste management system for residents and businesses in unincorporated Sacramento County. With implementation of the project, the project site would be annexed into the City of Sacramento and solid waste collection and recycling services would be provided by the City of Sacramento Department of Public Works Solid Waste Division. The project site would be incorporated into Solid Waste Collection Area 5.

Materials collected by the Solid Waste Division are sorted at the Sacramento Recycling and Transfer Station with the remaining refuse taken to Lockwood Landfill in Lockwood, Nevada. The Public Works Solid Waste Division does not use a specific calculation to determine the volume of solid waste that would be generated by development projects (Strauss, pers. comm., 2005). However, the California Integrated Waste Management Board (CIWMB) provides an average per capita disposal rate 0.36 tons per year per residence and a disposal rate of 0.3 (general merchandise) to 2.9 (grocery stores) tons per day for commercial uses for Sacramento County (CIWMB 2005a).

The Sacramento Recycling and Transfer Station is limited to accepting 2,000 tons of solid waste per day under their Solid Waste Facilities Permit and currently the transfer station accepts approximately 1,100 tons per day (Dunleavy, pers. comm., 2005). The remaining life expectancy of Lockwood Landfill is currently estimated to be 90 years (Dunleavy, pers. comm., 2005).

## **PUBLIC SCHOOLS**

The project site is within the Rio Linda Union School District (RLUSD) and Grant Joint Union High School District (GJUHS). RLUSD provides education services for kindergarten through sixth grade students. GJUHS provides education services for junior high and high school students.

Regency Park Elementary is the closest elementary school to the project site and is located at 5901 Bridgecross Drive approximately 2.5 miles east of the project site. The school currently has an enrollment of 400 students with an estimated capacity for 700 students. The Rio Linda School District has established a goal of 20 students per classroom for kindergarten through 3rd grade students and a goal of 32 students per classroom for 4th through 6th grade students (Bonds, pers. comm., 2005).

Rio Linda Junior High School is the closest junior high school to the project site and is located at 1101 G Street in Rio Linda, approximately 6 miles east of the project site. Rio Linda Junior High School has a current enrollment of 587 students and an estimated capacity for 782 students (Taylor, pers. comm., 2005; Velasto, pers. comm., 2006).

Rio Linda High School is the closest high school to the project site and is located at 6309 Dry Creek Road in Rio Linda approximately 6 miles east of the project site. Rio Linda High School current enrollment is 2,011 students and has an estimated capacity of 2,093 students (Taylor, pers. comm., 2005; Velasto, pers. comm., 2006).

GJUHSD plans to construct a new joint use facility to serve junior high and high school students; located along East Levee Road approximately 3 miles east of the project site. This joint-use facility is planned to serve 1,000 junior high and 2,000 high school students starting in 2009.

## **LIBRARIES**

The Sacramento Public Library currently operates a joint-use facility located in the Inderkum High School that provides temporary services to the North Natomas community, as well as the students, faculty, and staff of both Inderkum High School and the Natomas Center of American River College (Landers, pers. comm., 2005). The library opened to the public on September 13, 2004, and is located approximately 2 miles southeast of the project site at 2500 New Market Drive (Sacramento Public Library 2005). A separate 23,000-square-foot facility is planned to be built as part of an educational complex which includes Inderkum High School and Natomas Center of American River College when funding becomes available. The Sacramento Public Library recently received a grant for construction of the new facility; however a tentative date for commencement of construction and completion has not been determined (Landers, pers. comm., 2005).

The North Natomas Library features a diverse collection of materials serving the needs of the high school and community college students, a collection for children, recreational and informational reading for adults, magazines, newspapers, and a variety of media as well as public computer work stations. In addition to the local collection, items from any of the Sacramento Public Library branches can be delivered to the North Natomas Library for public use (Sacramento Public Library 2005).

The Sacramento Public Library is currently preparing their first Facilities Master Plan which will, among other things, identify the Sacramento Public Library's service goals. Currently the Sacramento Public Library does not have an established service goal for provision of library services to the community (Landers, pers. comm., 2005).

### **6.5.3 REGULATORY SETTING**

#### **STATE OF CALIFORNIA**

##### **Public Schools**

California Code Section 17620 authorizes school districts to levy a fee, charge, dedication, or other requirement against any construction in their boundaries for the purpose of funding the construction or reconstruction of school facilities. The fee, charge, dedication, or other requirement may be applied to construction of new residential, commercial, and industrial construction. The maximum fee amount that school districts can assess is limited by statutes provided in Section 65995 of the California Code. Level 1 fee maximums are \$2.14 per square foot for residential development and \$0.34 per square foot for commercial and industrial development. The California Department of Education (DOE) permits local school districts to increase these fees, subject to DOE review, and approval of a nexus study from the school district that demonstrates that costs incurred by the school district for the provision of school facilities and services are higher than the Level 1 funding provides. In such an instance, a nexus must be demonstrated in the study between what the local school district wants to increase the fees to and the actual cost of provision of school facilities and service.

##### **City of Sacramento General Plan**

The City of Sacramento General Plan includes the following goals and policies related to fire protection services that would be applicable to the project.

- ▶ Provide adequate fire service for all areas of the City. (Goal A)

- ▶ Continue to support all efforts directed at providing the best fire protection services at the least cost. (Policy 1)
- ▶ Ensure that adequate water supplies are available for fire-fighting equipment in newly developing areas. (Policy 2)
- ▶ Promote greater coordination of land use development proposals with the Fire Department in order to ensure adequate on-site fire protection provisions. (Policy 4)

The City of Sacramento General Plan includes the following goals and policies related to the provision of law enforcement services that would be applicable to the project.

- ▶ Provide the highest possible level of police service to protect City residents and businesses. (Goal A)
- ▶ Continue Police Department participation in the review of subdivision proposals and in assisting the Public Works department with traffic matters. (Policy 1)

The City of Sacramento General Plan does not contain any policies specifically applicable to the provision of solid waste and school services to the project.

### **LAFCo**

The LAFCo Policies, Procedures, and Guidelines document includes the following standards related to the provision of urban services to annexed areas.

- ▶ The annexation must be consistent with the applicable Master Service Elements. An annexation ... shall be approved only if the services element of the Spheres of Influence Plan of the affected agency or agencies demonstrates that adequate services will be provided within the time frame needed by the inhabitants of the annexed ... area. Proposed annexations for land areas that lie outside of the current and next five-year increments of projected service delivery in the services element are presumed not to comply with this standard unless the applicant clearly establishes that special and unique circumstances exist which ensure the provision of quality services during the applicable time frame for the affected area consistent with the other standards. (Section I, Standard Number 4)
- ▶ The annexation must provide the lowest cost and highest quality of urban services for the affected population. LAFCo will approve an annexation ... only if the Commission determines that the annexing agency possesses the capability to provide the most efficient delivery of applicable urban services for the affected population. (Section I, Standard Number 5)

## **6.5.4 IMPACTS AND MITIGATION MEASURES**

### **METHOD OF ANALYSIS**

Analysis provided in this section is based on consultation with local public service providers, review of policies for provision of public services, and comparison of the project’s public service ratios to goals established by service providers. Analysis of the project’s effect on park and open space resources is provided in Section 6.6, “Parks and Open Space.”

### **THRESHOLDS OF SIGNIFICANCE**

As identified in the State CEQA Guidelines (Appendix G), an impact related to the provision of public services would be considered a significant environmental impact if the proposed project would:

- ▶ Result in substantial adverse physical impacts associated with the provisions of new or physically altered governmental facilities, or 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 following public services:
  - Fire protection
  - Law enforcement
  - Solid Waste
  - Schools

## IMPACTS AND MITIGATION MEASURES

### IMPACT 6.5-1

**Increased Demand for Fire and Emergency Medical Services.** *Although SFD is planning to construct a new fire station near the project site and with this facility SFD would provide services to the project site within acceptable standards, the timing of the construction of this facility is currently unknown. Because it is unknown whether adequate fire protection facilities would be in place at the time the first occupancy permit is issued, the project could result in residents living in an area where inadequate fire and emergency response services are provided. This would be a **potentially significant** impact.*

The City of Sacramento Fire Department’s optimal response time for fire and emergency medical calls is 4.5 minutes from the time the call is placed. Fire station 30 would provide primary response for emergencies at the project site. Current response time to the project site from fire station 30 is approximately 7 minutes (Chang, pers. comm., 2005). Because response times to the project site would exceed the SFD’s goal of 4.5 minutes, response times to fire and emergency medical calls would exceed acceptable standards. In addition, the SFD expressed concern with their ability to adequately provide fire and emergency medical services to the project site (Chang, pers. comm., 2005).

The City has planned and intends to construct a new fire station that would serve the project site and areas near the project site as described above (King, pers. comm., 2005). However, the timing of construction of this station is currently unknown, and it is not certain whether this facility would be in place at the time the first occupancy permit is issued for the site.

Because it is unknown whether adequate fire protection facilities would be in place at the time the first occupancy permit is issued, the project could result in residents living in an area where inadequate fire and emergency response services are provided. This would be a **potentially significant** impact.

### Mitigation Measure 6.5-1: (City of Sacramento and LAFCo)

- a. The project applicant shall coordinate with the City of Sacramento to determine the timing of construction of a new fire station that would serve the proposed project. The project applicant shall enter into an agreement with SFD to ensure that adequate fire protection services would be in place before the issuance of the project’s first occupancy permit. Potential options for adequate services could include construction of a new fire station or an agreement for temporary dedicated services to serve the project site.
- b. The project’s Finance Plan shall identify necessary public facility improvements needed to serve the project, 100% of the costs required, and all the project’s fair-share costs associated with provision of these facilities and services. The project applicant shall pay into a fee program, as established by the Greenbriar Finance Plan, that identifies the funding necessary to construct needed public facilities (e.g., police, fire, water, wastewater,

library, and schools). The Draft Greenbriar Finance Plan is provided in Appendix C. The Finance Plan would be structured to ensure that adequate public facilities are in place as development occurs.

### Significance after Mitigation

With implementation of the above mitigation, the project's impact to fire services would be reduced to a less-than-significant level. However, the mitigation proposed (i.e., construction of a new fire station) could result in construction-related environmental effects including increased air emissions, traffic trips, conversion of agricultural lands and open space areas, and impacts to special-status species and wildlife. Further, operation of the station could result in potential land use conflicts including increased noise associated with engine operations, increased roadway traffic volumes, and increased safety hazards. The proposed station would be located within the North Natomas area. Resources within the North Natomas area are generally similar to resources found within the project site. Mitigation recommended for the project would also substantially reduce impacts associated with construction and operation of this facility. However, it is unknown whether mitigation would reduce impacts to a less-than-significant level. Therefore, construction of the proposed new fire station, which would be required to provide adequate fire protection services at the project site, could result in significant and unavoidable environmental effects. Therefore, for purposes of CEQA, this would be a *significant and unavoidable* impact.

IMPACT 6.5-2
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**Increased Demand for Law Enforcement Services.** *Although the project would increase demand for police personnel, the SPD has indicated that it could serve the project site, without the need to construct any new law enforcement facilities (McCray, pers. comm., 2005). Therefore, the project would have a less-than-significant impact on police services.*

Although the SPD does not have an adopted officer-to-resident ratio, the SPD currently provides service at a ratio of 1.7 sworn police officers per 1,000 residents. The project would generate an estimated 8,926 residents (based on U.S. Census 2000 data of 2.57 average household size in the City of Sacramento x 3,473 households in project), which would result in a demand for approximately six officers. Staff of the police department indicated that based on past police department policy and actions, sworn officers would be added on an as-needed basis to provide adequate public safety to Sacramento in response to continued growth of the North Natomas area (McCray, pers. comm., 2005). Ultimately, the project site would be served primarily by the new North Natomas Police Station located in the Town Center, approximately 1.9 miles east of the project site along Del Paso Road. However, the timing of construction of this facility is currently unknown. No new police facilities would be required to specifically serve the project (McCray, pers. comm., 2005). Further, as part of the project's finance plan (see Mitigation Measure 6.5-1b), the applicant would pay into a fee program that would support the funding of public facilities needed to serve all development within the project area. A copy of the Draft Greenbriar Finance Plan is included in Appendix C. The fee program would be structured to ensure that basic facilities are in place when needed for development, including police facilities (see Mitigation Measure 6.5-1).

Because the City would add personnel to the police department on an as-needed basis to meet service goals, the project would not result in the need to construct any new police facilities to serve the project (the construction of which could result in significant physical environmental impacts). The applicant's finance plan would ensure adequate funding is paid into a fee program that would ensure basic police services would be provided as development occurs; the project would not result in any substantial adverse impacts to police facilities and services. Therefore, this impact would be considered *less than significant*.

**IMPACT  
6.5-3**

**Increased Demand for Solid Waste Disposal Services.** *Additional solid waste facilities would not be required with development of the proposed project. Therefore, there are **no impacts** related to provision of adequate solid waste collection and disposal services.*

The project would be served by the City of Sacramento Department of Utilities Solid Waste Division. The project site would be located within Solid Waste Collection Area 5. Residents and tenants of the project site would be provided trash cans or bins by the Public Works Department for disposal of solid wastes. The Utilities Department would be responsible for arranging garbage pick-up services at the project site. Staff of the Utilities Department indicated that additional garbage trucks or facilities would not be necessary to serve the project site and that the project could be accommodated by existing facilities and resources in the North Natomas area (Strauss, pers. comm., 2005).

Materials collected from the project site would be sorted at the Sacramento Recycling and Transfer Station with the remaining refuse taken to Lockwood Landfill in Lockwood, Nevada. A curbside recycling program would be required as part of the collection service to divert recyclable wastes from the waste stream. Because the Utilities Solid Waste Division does not use a specific calculation to determine the volume of solid waste that would be generated by development projects, calculations from the California Integrated Waste Management Board (CIWMB) are used. The CIWMB provides an average per capita disposal rate for Sacramento County of 0.36 tons per year per residence (CIWMB 2005a). The project would construct 3,473 residences which would result in the generation of 1,250 tons of refuse per year.

The project includes 13.6 gross acres of village commercial land uses, 17.2 gross acres of neighborhood commercial land uses, and 11.2 gross acres of educational uses, for a total of 42 gross acres. Business waste disposal rates are calculated by CIWMB to range from 0.3 tons per employee per year for general merchandise stores to 2.9 tons per employee per year for food stores (CIWMB 2005b).

The North Natomas Community Plan uses 30 employees per acre for estimating the total number of employees generated by commercial uses. For the purposes of this analysis, 30 employees per acre was used to estimate solid waste generation rates from the project's proposed commercial uses. It is estimated that proposed commercial land uses would generate a total of 924 employees. Assuming that the 13.6-gross-acre village commercial lot would be developed with a food store and the 17.2-gross-acre neighborhood commercial lot would be developed with a general merchandise store, the commercial land uses associated with the proposed project would result in the generation of 1,338 tons of refuse per year. In addition, the project includes a 11.2-acre (gross) school site for development of a future elementary school. School waste disposal rates are not provided by CIWMB; however, CIWMB's website (CIWMB 2004) provides an estimated solid waste generation rate at 1 pound per student per day as a general level of information for planning purposes. Assuming the project would generate 1,098 elementary school students that attend school approximately 185 days per year (based on Rio Linda Union School District 2005–2006 calendar), the elementary school would generate approximately 102 tons (203,130 pounds) of refuse per year.

Combining the residential and commercial land use solid waste disposal rates, the total solid waste generated by the project would be approximately 737 tons of refuse per day which accounts for approximately 0.4 percent of the solid waste accepted at the Sacramento Recycling and Transfer Station on a daily basis. This volume of waste is not substantial in relation to total available capacity and staff of the Department of Utilities Solid Waste Division have indicated that the transfer station would be able to accept solid wastes from the project (Strauss, pers.

comm., 2005). In addition, the City has determined through its General Plan that the Lockwood Landfill would have sufficient capacity to serve future needs of the City for the next 90 years.

Because existing solid waste facilities would have adequate capacity to serve the project into the foreseeable future, additional solid waste facilities would not be required. Therefore, the project would have a *less-than-significant* impact on solid waste services.

No mitigation is required.

**IMPACT  
6.5-4**

**Increased Demand for School Services.** *School facilities currently serving the Natomas area, including the proposed elementary school site at the project site, would provide adequate school services to the project site. No additional facilities would be required. In addition, the project applicant would be required to pay development impact fees to Grant Union and Rio Linda Union school districts equal to \$2.24 per square foot for residential development and \$0.36 per square foot for commercial development. (Pollock, pers. comm., 2005) Payment of the development impact fees would provide the legally maximum required level of funding under State law, and would fully mitigate project-related school impacts. As a result, the project would result in less-than-significant impacts to school services.*

The project includes land reserved for the construction of a 10-acre (net) elementary school site within the southeastern portion of the project site. According to RLUSD, the site would have the capacity to serve approximately 800 students within a facility consisting of 38 classrooms (Porter 2006, Pollock, pers. comm., 2006).

Based upon the student generation rates provided in the NNCP and from RLUSD, the project would generate a total of 1,484 students, as detailed in Table 6.5-1. Of these students, 724 are anticipated to be in the elementary school grades. Students generated by the project would be enrolled at the on-site elementary school, Rio Linda Junior High School, or Grant Union High School.

**Table 6.5-1  
Projected Student Generation, Greenbriar Project and Project Alternatives**

Land Use	Elementary (K-6)		Middle School (7-8)		High School (9-12)	
	Student Generation Factor <sup>1</sup>	Students	Student Generation Factor <sup>2</sup>	Students	Student Generation Factor <sup>2</sup>	Students
<b>Proposed Project</b>						
Low-Density (671 du)	0.32	215	0.09	60	0.156	105
Medium-Density (2,215 du)	0.20	443	0.09	199	0.156	346
High-Density (332 du)	0.20	66	0.08	27	0.069	23
Subtotals	–	724	–	286	–	474
<b>Total Proposed Project Student Generation</b>						<b>1,484</b>
du = dwelling unit						
<sup>1</sup> Obtained from Rio Linda Union School District (Porter 2006)						
<sup>2</sup> Obtained from North Natomas Community Plan (City of Sacramento 1994)						



As identified above, the elementary school proposed on-site would accommodate approximately 800 elementary school students. The project is anticipated to generate 724 elementary school students. As a result, the on-site elementary school would have sufficient capacity to meet demands generated by the project and no long-term shortfall of elementary school services and facilities would result.

Staff of Grant Joint Union School District indicated that Rio Linda Junior High School and High School has sufficient existing capacity to meet the project's junior high and high school demands (Brantley, pers. comm., 2005). In addition, Grant Union High School District plans to construct a new junior high and high school joint use facility on a 70-acre site located approximately 3 miles east of the project site. The junior high school is planned to serve 1,000 students and the high school is planned to serve 2,000 students. The joint use facility is planned to become operational in the year 2009 (Raymond, pers. comm., 2005). Therefore, sufficient high school and junior high school capacity exists and no long-term shortfall of high or junior high school services and facilities would result.

In addition, as allowed by State law, the project applicant has agreed to pay school impact fees, which would be allocated to Rio Linda Union and Grant Joint Union School Districts. These school districts would be responsible for constructing the facilities needed to serve this project. Although the school impact fees are often insufficient to fund 100 percent of new school facility construction and operation, the California State Legislature has declared the school impact fee to be full and adequate mitigation under CEQA. Under California Government Code Section 65996, the City is limited to charging the statutorily created fee to offset impacts to local school districts generated by proposed projects. Section 65996 does not provide for remediation of existing deficiencies in school services. Construction of the proposed elementary school and payment of school impact fees would result in a *less-than-significant* impact on school services and facilities as defined by CEQA. Further, the project applicant has come to an agreement with the Rio Linda Union School District to provide supplemental funding above and beyond the required school impact fees mandated by state law for construction of a new elementary school on the project site. Along with supplemental funding, the project applicant agreed to allow joint use of the adjacent 3.7-acre neighborhood park for elementary school outdoor activities and events.

No mitigation is required.

**IMPACT  
6.5-5**

**Increased Demand for Library Services.** *The existing library located at 2500 New Market Drive would provide library services to the project. In addition, a new library is planned to be built next to Inderkum High School when funding is available. The project applicant would pay into a fee program that would contribute to the funding of this facility. No additional library facilities would be required to serve the project. Therefore, no impacts related to library services would occur.*

The Sacramento Library currently provides temporary library services in the North Natomas community area, including the project site, from Inderkum High School. The Sacramento Library recently received approval of grant funding from the State of California to construct a new library (approximately 23,000 square feet in size) at an educational complex which is adjacent to Inderkum High School. The Sacramento Library is currently in the process of formalizing the grant funding with the State of California. Additional funding would be required from new development to construct the new library. As part of the project's financing plan (Appendix C), the project applicant would pay into a fee program that would support the funding of public facilities that would serve all development within the project area (see Mitigation Measure 6.5-1a). The fee program would be structured to ensure that basic facilities are in place when needed for development, including library services.

Because the project would not result in the need to construct any new, unplanned library facilities, and the applicant would pay into a fee program that would contribute to funding of a new library facility currently proposed adjacent to Inderkum High School, the project would result in *no impact* on library services.

No mitigation is required.