4.7.1 INTRODUCTION

This section describes the existing public services and recreational facilities that serve the project site and its vicinity and potential impacts to these services and facilities from the construction and occupancy of the proposed El Dorado Hills Apartments project ("proposed project"). The public services addressed in this section include fire protection, law enforcement, schools, libraries, and parks and recreational facilities. Regulations and policies affecting these public services are also described. Information in this section is based on consultation with individual service providers and County staff.

4.7.2 ENVIRONMENTAL SETTING

4.7.2.1 Fire Protection

The project site is located within the service area of the El Dorado Hills Fire Department (EDHFD). The EDHFD operates four fire stations and covers approximately 30 square miles of territory in western El Dorado County. The EDHFD employs 68 paid staff. In 2016, the EDHFD responded to 3,595 calls for service, a 17 percent increase from 2015 (EDHFD 2016).

Fire Station 85, located at 1050 Wilson Boulevard, is the primary station that serves the project site. Equipment at this station includes a Type 1 fire engine with basic life support capability (emergency medical technicians). The current staff at Fire Station 85 includes one medic unit ¹ with two personnel and four personnel affiliated with the fire engine. In 2016, Station 85 responded to 692 calls for service. Fire Station 87, located at 4680 Golden Foothill Parkway, may also be responsible for responding to the project site. Fire Station 87 is staffed with 3 personnel and houses one Type 1 fire engine. In 2016, Station 87 responded to 678 calls of service. The EDHFD's target response time is 6 minutes 90 percent of the time. As of May 2017, the overall average response time for all calls within Station 85 and 87 response areas was four minutes and 30 seconds, respectively (Cox 2017).

4.7.2.2 Police Services

Police services for the proposed project would be provided by the El Dorado County Sheriff's Office. The County Sheriff's Office has a force of 371, including 164 sworn officers, and provides service to approximately 1,700 square miles of unincorporated land within El Dorado County. Currently, there is a substation in the El Dorado Hills Town Center, which serves as a satellite office for temporary deputy use

A fire medic unit includes medical kits and Emergency Medical Technicians (EMTs).

and is occasionally staffed by STARS (Sheriff's Team of Active Retirees) members during limited hours. The County's target service ratio is 1.0 officer per 1,000 residents. With a service population of 183,957 in unincorporated El Dorado County and 164 sworn officers, the current service ratio is 0.90 (or 1 officer for every 1,112 residents), which does not meet the County's standard.

Policy 5.1.2.2 of the County General Plan identifies that the minimum level of service for sheriff responses should be an 8-minute response to 80 percent of the population. In 2016, the sheriff's department responded to 124,987 calls for service (EDCS 2016)..

4.7.2.3 Schools

The proposed project is located within the boundaries of the Buckeye Union Elementary School District (ESD) and the El Dorado Union High School District (HSD). The Buckeye Union ESD provides kindergarten through 8th grade services for students living within its boundaries, and the El Dorado Union HSD provides 9th through 12th grade services for students living within its boundaries. Student enrollment in the 2016-17 school year was 5,216 for the Buckeye Union ESD and 6,649 for the El Dorado Union HSD (CDE 2017).

The Buckeye Union ESD operates six elementary schools and two middle schools, and the El Dorado Union HSD operates four high schools and five continuation high schools. The project site is located within the area served by Oak Meadow Elementary School, Rolling Hills Middle School, and Oak Ridge High School.

Oak Meadow Elementary School is located less than 1 mile north of the project site at 7701 Silva Valley Parkway and has a current enrollment of 862 students. Rolling Hills Middle School is located approximately 2 miles north of the project site at 7141 Silva Valley Parkway and has a current enrollment of 1,024 students. District staff has indicated that these schools have capacity to accept new students (Boike 2017).

Oak Ridge High School is located approximately 2 miles north of the project site at 1120 Harvard Way. The High School currently has an enrollment of approximately 2,400 students and is operating at capacity (Torres 2017). In order to accommodate additional students in the future, the school would secure financing to create more classes and possibly on-site portable classrooms to be constructed adjacent to the existing facilities, if necessary.

4.7.2.4 Parks and Recreation

Parks and recreational facilities, including trails, in the vicinity of the proposed project are provided by the El Dorado Hills Community Service District (CSD) and El Dorado County. A discussion of each park system is provided below.

El Dorado Hills Community Service District Facilities

The El Dorado Hills CSD owns and manages 294 acres of land, including 191 acres of parks and 127 acres of open space, and serves a population of about 38,000 (EDHCSD 2014). The parks closest to the project site are Creekside Greens Park, approximately 0.3 miles south, Peter Bertelson Park, approximately 0.8 miles northwest, and Allan Lindsey Park, approximately 0.9 miles northeast of the project site. The El Dorado Hills CSD strives to provide 5 acres of parks per 1,000 residents. As of 2016, the CSD provided approximately 7.7 acres of parkland per 1,000 residents (EDHCSD 2017).

El Dorado County Recreational Facilities

El Dorado County owns and manages approximately 274 acres of land for parks and recreation purposes, which includes six existing public recreational facilities (about 139 acres) and land to be developed into four future parks (about 134 acres). Existing park facilities include one neighborhood park, three community parks, and two regional parks. The closest County park to the project site is Bradford Park, a neighborhood park located 7.5 miles to the east in Shingle Springs. El Dorado County strives to provide 1.5 acres per 1,000 residents for regional and community parks, and 2 acres per 1,000 residents for neighborhood parks. Based on a current population of approximately 185,600 residents, the County currently provides approximately 0.7 acres of regional and community parks per 1,000 residents and 0.01 acres of neighborhood parks per 1,000 residents.

4.7.2.5 Libraries

El Dorado County Library system operates six branch libraries and a bookmobile service and serves a population of approximately 92,000 cardholders. The branch closest to the proposed project is the El Dorado Hills Library located at 7455 Silva Valley Parkway, approximately 2.2 miles from the project site. The 16,000 square foot library opened in February 2006 and serves a population of 28,490. It features an adult reading room with fireplace, a separate storytime room, a young adult area, and automated circulation system. The library has a capacity of 60,000 volumes (Robbins 2017). While the County library system does not currently have a planning standard, the American Library Association provides a standard of 0.5 square feet of library space and two volumes per capita. With approximately 0.56 square

feet of library space and 2.1 volumes per capita, the El Dorado Hills Branch Library currently meets this standard.

4.7.3 REGULATORY CONSIDERATIONS

4.7.3.1 State Laws and Regulations

Senate Bill 50

The Leroy F. Greene School Facilities Act of 1998, or Senate Bill 50 (SB 50), restricts the ability of a local agency to deny project approvals on the basis that public school facilities (classrooms, auditoriums, etc.) are inadequate. School impact fees are collected at the time building permits are issued. These fees are used by the local schools to accommodate the new students added by the project, reducing potential impacts on schools to a less than significant impact. Payment of school fees is required by SB 50 for all new residential development projects and is considered full and complete mitigation for school impacts of new development.

Quimby Act

The 1975 Quimby Act (California Government Code Section 66477) requires developers to set aside land, donate conservation easements, or pay park fees to help mitigate the impacts of their projects. The extent of the mitigation is established by the residential density of the area, with the amount of land dedicated or fees paid increasing in areas of higher occupancy. The standards for parkland acquisition or payment of fees in lieu thereof is implemented by the County through §120.12.090 of the County Code. It is also referred to in Policy 9.1.1.5 of the General Plan, which states:

Parkland dedicated under the Quimby Act must be suitable for active recreation uses and:

- Shall have a maximum average slope of 10 percent;
- Shall have sufficient access for a community or neighborhood park; and
- Shall not contain significant constraints that would render the site unsuitable for development.

California Fire Code

The California Fire Code (Title 24 CCR, Part 9) establishes minimum requirements to safeguard public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings. Chapter 33 of CCR contains requirements for fire safety during construction and demolition.

4.7.3.2 Local Plans and Policies

County of El Dorado General Plan

The following presents guiding and implementing policies from the current County of El Dorado General Plan (2004) relevant to public services and contained within the Public Services and Utility Element.

GOAL 5.1: PROVISION OF PUBLIC SERVICES: Provide and maintain a system of safe, adequate, and cost-effective public utilities and services; maintain an adequate level of service to existing development while allowing for additional growth in an efficient manner; and, ensure a safe and adequate water supply, wastewater disposal, and appropriate public services for rural areas.

OBJECTIVE 5.1.2: CONCURRENCY: Ensure through consultation with responsible service and utility purveyors that adequate public services and utilities, including water supply, wastewater treatment and disposal, solid waste disposal capacity, storm drainage, fire protection, police protection, and ambulance service are provided concurrent with discretionary development or through other mitigation measures provided, and ensure that adequate school facilities are provided concurrent with discretionary development to the maximum extent permitted by State law. It shall be the policy of the County to cooperate with responsible service and utility purveyors in ensuring the adequate provision of service. Absent evidence beyond a reasonable doubt, the County will rely on the information received from such purveyors and shall not substitute its judgment for that of the responsible purveyors on questions of capacity or levels of service.

Policy 5.1.2.1

Prior to the approval of any discretionary development, the approving authority shall make a determination of the adequacy of the public services and utilities to be impacted by that development. Where, according to the purveyor responsible for the service or utility as provided in Table 5-1 (presented as **Table 4.7-1** in this Draft EIR), demand is determined to exceed capacity, the approval of the development shall be conditioned to require expansion of the impacted facility or service to be available concurrent with the demand, mitigated, or a finding made that a CIP project is funded and authorized which will increase service capacity.

Policy 5.1.2.2

Provision of public services to new discretionary development shall not result in a reduction of service below minimum established standards to current users, pursuant to Table 5-1 (presented as **Table 4.7-1** in this Draft EIR).

Table 4.7-1 Minimum Levels of Service

	Community Region	Rural Center and Rural Region
Public water source	As determined by purveyor	As determined by purveyor, when applicable
Private wells	Environmental Management	Environmental Management
Public water treatment capacity	As determined by purveyor	As determined by purveyor
Public sewer treatment capacity	As determined by purveyor	As determined by purveyor
On-site sewage disposal	Environmental Management	Environmental Management
Storm drainage	Department of Transportation	Department of Transportation
Solid waste	Environmental Management	Environmental Management
County and State road circulation system	Е	D
Schools	As determined appropriate by the school districts	As determined appropriate by the school districts
Parks	Specific plan for new communities or Quimby Fee/dedication program for tentative maps	Quimby Fee/dedication program for tentative maps
Fire district response	8-minute response to 80% of the population	15 to 45-minute response
Sheriff	8-minute response to 80% of the population	No standard
Ambulance	10-minute response to 80% of the population	20-minute response in Rural Regions and "as quickly as possible" in wilderness areas*

GOAL 5.7: EMERGENCY SERVICES: Provide adequate and comprehensive emergency services, including fire protection, law enforcement, and emergency medical services.

OBJECTIVE 5.7.1: FIRE PROTECTION (COMMUNITY REGIONS): Ensure sufficient emergency water supply, storage, and conveyance facilities are available, and that adequate access is provided for, concurrent with development.

Policy 5.7.1.1 Prior to approval of new development, the applicant will be required to demonstrate that adequate emergency water supply, storage, conveyance facilities, and access for fire protection either are or will be provided concurrent with development.

OBJECTIVE 5.7.3: LAW ENFORCEMENT: An adequate, comprehensive, coordinated law enforcement system consistent with the needs of the community.

Policy 5.7.3.1 Prior to approval of new development, the Sheriff's Department shall be requested to review all applications to determine the ability of the department to

provide protection services. The ability to provide protection to existing development shall not be reduced below acceptable levels as a consequence of new development. Recommendations such as the need for additional equipment, facilities, and adequate access may be incorporated as conditions of approval.

GOAL 5.8: SCHOOL SERVICES: Provide an adequate, high-quality school system consistent with the needs of current and future residents.

OBJECTIVE 5.8.1: SCHOOL CAPACITY: Require that adequate school capacity exists and/or appropriate mitigation consistent with State law to serve new residents concurrent with development.

Policy 5.8.1.1

School districts affected by a proposed development shall be relied on to evaluate the development's adverse impacts on school facilities or the demand therefor. No development that will result in such impacts shall be approved unless:

- 1. To the extent allowed by State law, the applicant and the appropriate school district(s) have entered into a written agreement regarding the mitigation of impacts to school facilities; or
- **2.** The impacts to school facilities resulting from the development are mitigated, through conditions of approval, to the greatest extent allowed by State law.

GOAL 5.9: LIBRARIES AND CULTURAL FACILITIES: Addresses providing a quality County library system and other cultural facilities consistent with the needs of current and future residents.

OBJECTIVE 5.9.1: LIBRARY FACILITIES: Maintain existing library facilities and locate new libraries to serve existing and new communities throughout the County.

Policy 5.9.1.1 Allow flexibility in the placement of libraries.

Policy 5.9.1.2 New libraries shall be funded through Community Services Districts, assessment districts, zones of benefits, or other sources.

El Dorado County Subdivision Ordinance (Section 120.12.090)

Section 120.12.090 of the El Dorado Code of Ordinances mandates that when a subdivision proposes to or creates residential lots, the Board of Supervisors has the authority to require the dedication of land, the payment of fees in lieu thereof, or a combination of both for park and recreational purposes. The payment shall be conveyed to the local public agency which provides park and recreational services in the area; in

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this case, the El Dorado Hills CSD. The amount of fees and/or land dedicated is directly related to the population density of the project. Within the boundaries of the El Dorado Hills CSD, it is estimated that each dwelling unit has a density of 3-3/10 persons. For multiple family dwelling units, the density is approximated at 2-1/10 persons per unit. The goal of public interest convenience, health, and safety is perpetuated by this section, as the County aims to provide three acres of park area per 1,000 residents within a subdivision.

4.7.4 IMPACTS AND MITIGATION MEASURES

4.7.4.1 Significance Criteria

In accordance with Appendix G of the *California Environmental Quality Act (CEQA) Guidelines*, the impact of the proposed project related to public services, recreation, and utilities and service systems would be considered significant if the project would:

- Result in substantial adverse physical impacts associated with the provision of new or physically
 altered governmental facilities or a need for new or physically altered governmental facilities, the
 construction of which could cause significant environmental impacts, in order to maintain acceptable
 service ratios, response times, or other performance objectives for any of the following public
 services.
 - Fire protection
 - Police protection
 - Schools
 - Other public facilities
- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
- Require the construction or expansion of offsite recreational facilities that might have an adverse
 physical effect on the environment.

4.7.4.2 Issues adequately addressed in the Initial Study

As noted in the Initial Study the proposed project would generate a demand for an additional 97 K-5 seats in the elementary school district, as well as an additional 38 seats in the high school district.² The proposed project would be required to pay school development fees, as dictated by state law, prior to the issuance of building permits. According to Government Code Section 65996, payment of fees constitutes full mitigation of any school impacts under CEQA. Following the payment of the SB 50 fees, impacts would be less than significant and no further analysis is required in the EIR.

4.7.4.3 Methodology

Public service providers serving the project site were contacted to determine existing operational service levels and whether there are any existing service deficiencies. The estimated population expected to be added to the area by the proposed development was presented to the service provider. Other details of the proposed project were also provided. The service provider then determined whether there would be a need to construct new or physically altered public facilities in order to maintain acceptable service ratios and serve the proposed project.

4.7.4.4 Project Impacts and Mitigation Measures

Impact PS-1: The proposed project would not require the construction of new or physically altered fire facilities. (Less than Significant)

Implementation of the proposed project would add approximately 492 residents to the population of El Dorado Hills. As such, there would be an increased demand for fire suppression services in the service area of Fire Stations 85 and 87. The EDHFD has indicated that it currently has the capacity to handle any increase in demand generated from project buildout. In addition, the EDHFD estimates that Stations 85 and 87 would have a response time between 4 and 5 minutes to the project site, which is well below the Department's target response time of 6 minutes 90 percent of the time. To ensure fire safety to the fullest degree, the EDHFD would increase training and equipment for Hose Above Ground and Standpipe operations that directly relate to the proposed project. The proposed project would pay a public safety fee as part of the County's development fee program, which would cover costs associated with expanded training and equipment (Cox 2017). As the EDHFD has indicated that it has capacity to serve the proposed project and that response times are adequate, the proposed project would not require the construction of new or physically altered EDHFD facilities, and there would be no potential for

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The Student Generation Rate used by the Buckeye and Latrobe districts is 0.451 student/dwelling unit. The Student Generation Rate used by the El Dorado Union High School District is 0.177 student/dwelling unit.

significant environmental impacts from the construction of new or expanded facilities. The impact of the proposed project related to the provision of fire protection services would be less than significant.

Mitigation Measures: No mitigation measures are required.

Impact PS-2: The proposed project would not require the construction of new or physically altered police facilities. (*Less than Significant*)

Implementation of the proposed project would add approximately 492 residents to the population of El Dorado Hills, thereby increasing demand for police services. The El Dorado County Sheriff's Department has indicated the proposed project could increase calls for service to the Town Center area due to compatibility issues with neighboring business. Several businesses in the vicinity of the project (i.e., a night club and movie theater) operate late hours, and the Sheriff's Department predicts that the operation of these businesses will result in complaints from future project residents. The County has a target service ratio of 1.0 officer per 1,000 residents, and therefore, the proposed project would generate the need for approximately 0.5 officers. However, the Sheriff's Department anticipates that it will need two additional officers to handle the anticipated requests for service in the Town Center area due to the project (Byers 2016). The proposed project would pay a public safety fee as part of the County's development fee program, which would provide funding for these additional officers. The addition of two officers would not be substantial enough to require the construction of new or physically altered facilities, and there would be no potential for significant environmental impact from the construction of new or expanded facilities. The impact of the proposed project related to the provision of police protection services in El Dorado Hills would be less than significant.

Mitigation Measures: No mitigation measures are required.

Impact PS-3: The proposed project would not require the construction of new or physically altered library facilities. (Less than Significant)

As noted above, the proposed project would increase the population of El Dorado Hills by approximately 492 persons, thereby increasing demand on library facilities. Based on a planning standard of 0.5 square feet of library space and two volumes per capita recommended by the American Library Association, the proposed project would generate the need for approximately 250 square feet of additional library space and about 1,000 additional volumes. The El Dorado Hill branch currently provides 0.56 square feet of

library space and 2.1 volumes per capita. The addition of the proposed project would lower these metrics to approximately 0.55 square feet of library space and about 2.0 volumes per capita, which is still above the recommended planning standard. In addition, the El Dorado Hills branch has indicated that the increased demand would not be substantial enough to necessitate the construction of new or expanded facilities. As a result, the El Dorado Hills Library has sufficient ability to accommodate the anticipated demand increase (Robbins 2017). Additionally, the project applicant would be required to pay development impact fees, if applicable, which would further reduce the project's impact related to library services. The impact associated with library services would be less than significant.

Mitigation Measures: No mitigation measures are required.

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Impact PS-4:

Development of the proposed project would increase the use of existing neighborhood parks or other recreational facilities but not result in substantial physical deterioration of the facilities. In addition, the demand created by the proposed project would not require the construction of new or physically altered parks and recreation facilities. (Less than Significant)

As noted above, the proposed project would increase the population of El Dorado Hills by approximately 492 persons, thereby increasing demand for parks owned and maintained by the El Dorado CSD and the County. The El Dorado Hills CSD strives to provide 5 acres of parks per 1,000 residents, and therefore, the proposed project would generate the need for approximately 2.5 acres of park land. The CSD currently provides approximately 7.7 acres of parkland to every 1,000 residents. The addition of the proposed project would lower the ratio to approximately 7.6 acres to every 1,000 residents, which is still well above the District's standard of 5 acres per 1,000 residents. As a result, the increase in demand for park facilities owned and maintained by the El Dorado Hills CSD would not be substantial, and the proposed project would not result in substantial physical deterioration of El Dorado Hills CSD park facilities or require the construction of new park facilities.

The County strives to provide 1.5 acres per 1,000 residents for regional and community parks, and two acres per 1,000 residents for neighborhood parks, and therefore, the proposed project would generate the need for approximately 0.7 acres of regional and community parks and about one acre of neighborhood parks. The County currently provides approximately 0.7 acres of regional and community parks per 1,000 residents and 0.01 acres of neighborhood parks per 1,000 residents, which is well below the County's standards. However, the increase in demand for County park facilities due to the project would not be substantial. Project residents would not likely use county park facilities to a significant extent, as the

closest county park is located 7.5 miles to the east, while several parks owned and maintained by the El Dorado Hills CSD are located close by within the El Dorado Hills community. Therefore, the proposed project would not result in substantial physical deterioration of County park facilities or require the construction of new County park facilities. The project would also include private recreational facilities and 0.51-acres of informal space, thus decreasing the need for project residents to use public parks. Finally, the project applicant would pay park impact fees as part of the County's development fee program. As such, development of the proposed project would not result in substantial physical deterioration of the facilities nor require the construction of new or physically altered parks and recreation facilities. Impacts associated with parks and other recreational facilities would be less than significant.

Mitigation Measures: No mitigation measures are required.

4.7.4.5 Cumulative Impacts and Mitigation Measures

Cumulative Impact C-PS-1: The proposed project, in conjunction with other closely related past, present and reasonably foreseeable future development, would not result in a significant cumulative impact on public services. (Less than

Significant)

The following analysis evaluates the significance of potential cumulative public service and recreation impacts of the proposed project in conjunction with the projects included in **Table 4.0-1**, which lists reasonably foreseeable projects in the County.

Fire Service

As discussed above under **Impact PS-1**, implementation of the proposed project would contribute to an increase in demand for fire protection services. However, this increase in demand would not result in the need for new or physically altered fire facilities, the construction of which could cause significant environmental impacts. The other approved and reasonably foreseeable development projects in the County, as listed in **Table 4.0-1**, would also result in an incremental demand for fire services. Each cumulative project has been or will be subject to environmental review and, if significant impacts are identified, mitigation measures would be implemented to avoid or reduce the impacts. In addition, in accordance with General Plan Policy 5.7.1.1, all new development must obtain review and approval of development plans by the fire department to ensure adequate levels of service and access. Regardless of future growth in the County, the fire department would have sufficient resources to accommodate an

increase in demand for fire protection services, even if an expansion of facilities is necessary. The cumulative impact on fire services and facilities would be less than significant.

Police

The proposed project, in conjunction with other approved and reasonably foreseeable projects in the County, would generate an increased demand for police services. As discussed above under Impact PS-2, implementation of the proposed project would contribute to an increase in demand for police services. However, this increase in demand would not result in the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts. Other approved and reasonably foreseeable development projects in the County listed in Table 4.0-1 would result in an incremental demand for police services. Each cumulative project has been or will be subject to environmental review and, if significant impacts are identified, mitigation measures would be implemented to avoid or reduce the impacts. In addition, in accordance with General Plan Policy 5.7.3.1, all new development must obtain review and approval of development plans by the Sheriff's Department to ensure adequate levels of service and access. Regardless of future growth in the County, the sheriff's department would have sufficient resources to accommodate an increase in demand for police services, even if an expansion of facilities is necessary. The cumulative impact on police services and facilities would be less than significant.

Library Services

The proposed project, in conjunction with other approved and reasonably foreseeable projects in the County, would generate an increased demand for library services. As discussed above under Impact PS-3, implementation of the proposed project would contribute to an increase in demand for library services. However, this increase in demand would not result in the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts. Table 4.0-1 lists all approved and reasonably foreseeable projects in El Dorado Hills. Each cumulative project has been or will be subject to environmental review and, if significant impacts are identified, mitigation measures would be implemented to avoid or reduce the impacts. Potential impacts associated with the construction of new library facilities are expected to be less than significant or if potentially significant, capable of being mitigated to a less than significant level with mitigation. Therefore, the cumulative impact from the construction or expansion of library facilities would be less than significant.

Parks

The proposed project, in conjunction with other approved and reasonably foreseeable projects in the County, would increase the use of existing parks and recreational facilities. As discussed above under

Impact PS-4, implementation of the proposed project would contribute to an increase in demand for parkland and the utilization of existing facilities, despite the private recreational facilities included in the proposed project. However, this increase in demand would not result in the need for new or physically altered parks and recreation facilities, the construction of which could cause significant environmental impacts. Table 4.0-1 lists all approved and reasonably foreseeable projects in El Dorado Hills. Each cumulative project has been or will be subject to environmental review and, if significant impacts are identified, mitigation measures would be implemented to avoid or reduce the impacts. Potential impacts associated with the construction of new parks and recreational facilities are expected to be less than significant or if potentially significant, capable of being mitigated to a less than significant level with mitigation. Therefore, the cumulative impact from the construction or expansion of parks and recreation facilities would be less than significant.

Mitigation Measures: No mitigation measures are required.

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