

5. Environmental Analysis

5.14 PUBLIC SERVICES

This section addresses public services including: fire protection and emergency services, police protection, school services, and library services. Park services are addressed in Section 5.15, *Recreation*. Public and private utilities and service systems, including water, wastewater, and solid waste services and systems, are addressed in Section 5.17, *Utilities and Services Systems*.

An essential consideration with respect to a proposed project's impact on public services, in particular for a General Plan, is the lead agency's capability to adequately fund required capital and operating expenses. In the City of Clovis, fire protection and police service are provided by the City. A fiscal analysis was prepared in conjunction with the General Plan Update (see Appendix I, *Fiscal Impact Analysis*). The analysis for the 2035 Scenario found the proposed project would likely:

- Generate a 25 percent general fund deficit if current development patterns continue under the existing 1993 General Plan, which assumes that Clovis remains a bedroom community, generating more housing growth than job growth; there are no changes in development policy; the local economy grows at the current trend rate; and increasing internet capture of taxable retail sales continues to reduce the City's sale tax revenues.
- Generate a 12 percent general fund budget deficit if the City implements the proposed General Plan, which assumes that the proposed development policies minimize the creation of new public safety hot spots; the City invests in economic development and achieves economic growth that generates 40 percent more jobs than past growth rates; and the City successfully directs new private sector investment to create destination retail development that compensates for internet capture of retail sales tax.
- Generates a balanced general fund budget if the City manages the development of public facilities and the delivery of public services commensurate with the level of revenues, which assumes that the City reduces the delivery of services to existing public safety hot spots or the City generates more revenue from or reduces the costs of providing services to public safety hot spots; regularly monitors and evaluates the level of service it provides and the revenues and costs associated with those services; regularly analyzes the fiscal implications of growth and development policies; and requires the use of community facilities districts, developer prefunding, landscaping and lighting maintenance districts, business improvement districts, and other funding and financing mechanisms as necessary to ensure that sufficient revenues are generated to pay for the level of public facilities and services provided by the City and expected by residents and businesses.

The fiscal analysis focused on the 2035 time horizon, but noted that the same trends would apply through full buildout of the proposed General Plan Update. Thus, the package of development patterns, policies, and management of facilities and services that produce a deficit in 2035 would produce a continuing deficit through full buildout—one that produces a balanced budget in 2035 would likely continue to produce a balanced budget through full buildout.

One key takeaway from the fiscal analysis is that the City's fiscal challenges are not about the location and pace of new development. Rather, it is the high cost of providing public safety services to hot spots in older areas of the City that create the biggest financial burdens for Clovis. Managing these existing hot spots and prohibiting the

5. Environmental Analysis

PUBLIC SERVICES

creation of new hot spots is as important to the City's future fiscal health as is using a variety of financing mechanisms to generate revenue from new growth and development.

5.14.1 Fire Protection and Emergency Services

5.14.1.1 ENVIRONMENTAL SETTING

Regulatory Background

Federal

International Fire Code

The International Fire Code (IFC) is a model code regulating minimum fire-safety requirements for new and existing buildings, facilities, storage, and processes. The IFC includes specialized, technical, fire- and life-safety regulations, with topics addressing fire-department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, use and storage of hazardous materials, protection of emergency responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings.

State

California Health and Safety Code

Sections 13000 et seq. of the California Health and Safety Code include fire regulations for building standards (also in the California Building Code), fire-protection and -notification systems, fire-protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire-suppression training.

California Fire Code

The California Fire Code (Title 24 California Code of Regulations, Part 9) is based on the 2012 International Fire Code and includes amendments from the State of California fully integrated into the code. The California Fire Code has fire safety-related building standards that are referenced in other parts of Title 24 of the California Code of Regulations.

Local

City of Clovis Municipal Code

The municipal code identifies land use categories, development standards, and other general provisions that ensure consistency between the City's General Plan and proposed development projects. The following provisions from the municipal code focus on fire services impacts associated with new development projects and are relevant to the proposed project:

- Title 4 (Public Safety), Chapter 4.10 (Fire Facility Development Impact Fee): Establishes a financing mechanism to construct, equip, and furnish fire stations to serve the City and its sphere of influence as community growth requires.

5. Environmental Analysis PUBLIC SERVICES

City of Clovis Community Facilities District 2004-01

In March 2004, the Clovis City Council approved the formation of Community Facilities District 2004-01, which provides gap funding for public safety operations in new growth areas generally north of Herndon and east of Locan Avenues. The Council also established an independent citizens' oversight committee for the purpose of reviewing Clovis Fire and Police Departments' revenue and expenditures associated with the Community Facilities District to ensure actual and budgeted expenditures are appropriate and within the intent of the formation of the district.

The Purpose and Intent of the Community Facilities District 2004-01 as established by the City Council is:

Police and Fire Services (the "Services") of the City of Clovis required to sustain the service delivery capability for emergency and non-emergency services to new growth area of the City of Clovis, including related facilities, equipment, vehicles, fire apparatus, services, supplies and personnel; provided however that any increases in special taxes for costs related to employee wages and benefits shall be limited as provided in the Rate and Method of apportionment of the Special Taxes to fund such Services.

Developments proceeding after March 2004 must petition to be annexed to the Community Facilities District 2004-01. Without annexation into the Community Facilities District, the City would not have the financial resources to operate facilities and provide public services (specifically police and fire protection), resulting in a potential adverse impact. The Community Facilities District is necessary to mitigate any impacts as well as to ensure consistency with General Plan goals and policies. Properties annexed into the district are required to provide funding for public safety operations in new growth areas. Major conditions include:

1. The maximum annual tax will be \$213.76 for single family residential and \$184.57 for multi-family residential.
2. The maximum tax will be increased by the Escalator Factor, which is the greater of the change in CPI or percentage change in population.
3. There will be a review not later than five years of inception of the Community Facilities District.
4. The annual tax will not apply to commercially zoned property.
5. The tax will apply only to that property for which a building permit is issued after January 1, 2004.
6. The costs of salary and benefit increases funded by the Community Facilities District will be limited to the Escalator Factor.

In June 2013, the Community Facilities Citizens Oversight Committee reviewed the actual 2011/12 expenditures and the 2012/13 budgets of the Clovis Fire and Police Departments and concluded that the actual and budgeted expenditures by the departments were appropriate and within the intent and purpose of the district. Revenue and allocation of costs attributable to the Community Facilities District 2004-01 were also determined appropriate. The committee recommended that the district and associated tax assessments continue as currently established (Clovis 2013a).

5. Environmental Analysis PUBLIC SERVICES

According to the City of Clovis 2013/2014 Annual Budget, it is anticipated that the Community Facilities District assessments will amount to approximately \$0.8 million and will provide essential investment in maintaining frontline public safety services as development extends towards Clovis’s growth areas (Clovis 2013b).

Existing Conditions

Clovis Fire Department

Fire Stations and Staffing

The Clovis Fire Department (CFD) participates in a statewide mutual-aid system that provides fire department resources throughout the State of California. On a local basis, CFD provides fire protection to the City of Clovis and supplements protection through an automatic aid agreement with the Fresno Fire Department west and south of the City’s Sphere of Influence (SOI) and the Fresno County Fire Protection District (FCFPD) to the north and east of the City’s SOI.¹

The CFD operates five stations, described below in Table 5.14-1 and shown on Figure 5.14-1, *Fire, Police, and Sheriff Stations*. CFD staff includes 61 sworn personnel—3 battalion chiefs, 15 captains, 15 engineers, and 24 firefighters—and 5 nonsworn personnel.

Table 5.14-1 CFD Fire Stations Serving the Planning Area

Station	Address	Equipment	Staffing
Station 1	633 Pollasky Avenue	Truck, Reserve Truck*	3-4
Station 2	2300 Minnewawa Avenue	Engine, Reserve Engine*, Urban Search and Rescue Unit*	3
Station 3	555 North Villa Avenue	Engine, Reserve Engine*	3
Station 4	2427 Armstrong Avenue	Engine, , Water Tender*, Brush Engine*	3
Station 5	790 North Temperance Avenue	Engine, Hazmat Unit*, OES Engine*	3

Source: Despain 2014 .

* Cross Staffed

According to the 2009 CFD Standards of Coverage for Emergency Response, fire-station service areas need to be between 4.5 and 5 square miles with minimum staffing at each fire station of one captain, one engineer, and one firefighter per 24-hour period. Currently, all five fire stations are within the designated 4.5- to 5-mile distance of each other and are staffed with the minimum requirements.

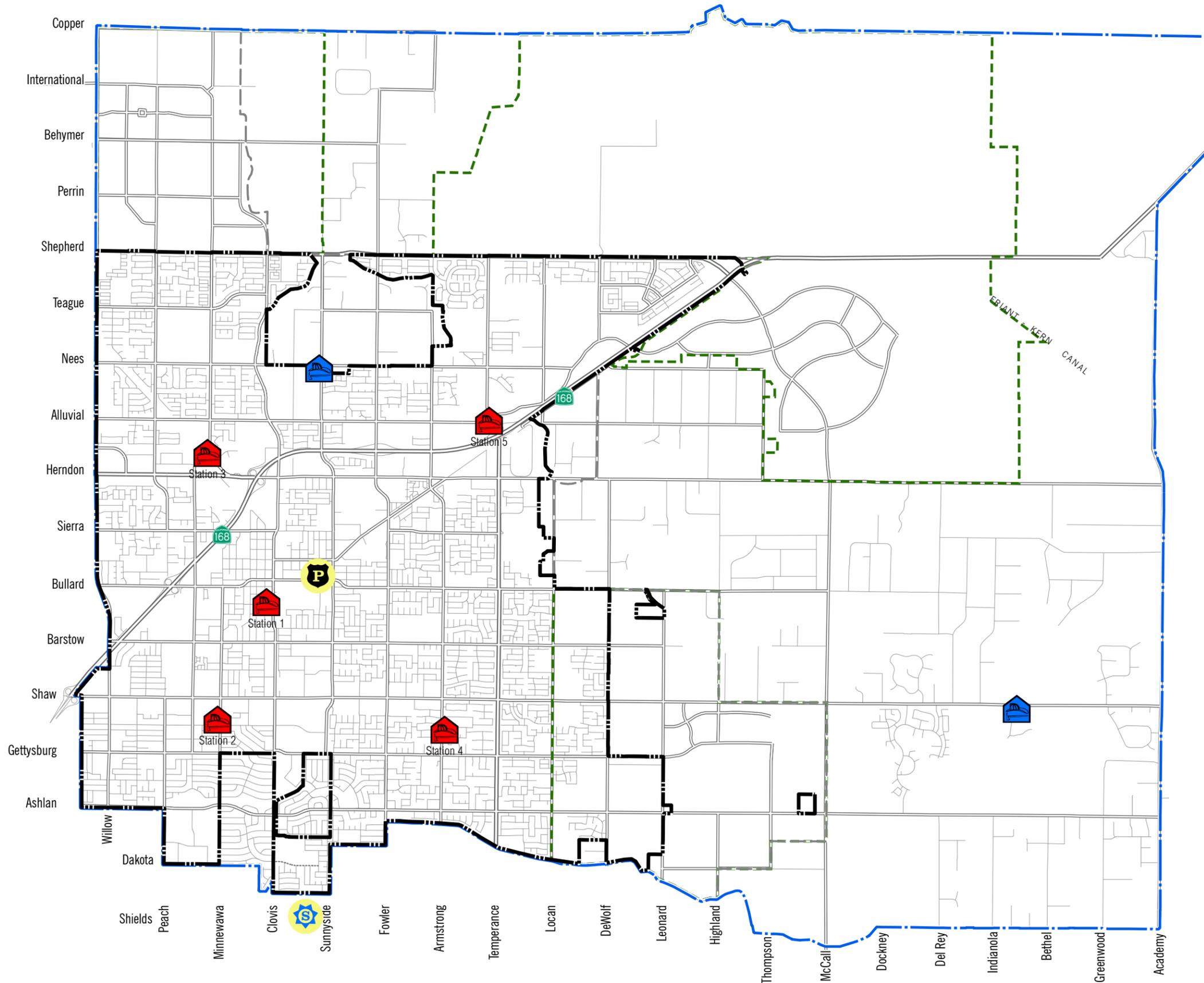
Providing emergency workers in sufficient quantities is also critical to the emergency response system. The National Fire Protection Association Standard (NFPA) 1710 provides recommendations of minimum workforce standards to accomplish provisions of fire suppression and emergency medical services. CFD uses NFPA 1710 as guidance to establish its own minimum staffing standards to ensure sufficient workforce is present in the event of emergency situations, which include the following.

¹ Automatic aid is assistance dispatched automatically by contractual agreement between two communities or fire districts. Mutual aid or assistance is arranged case by case.

5. Environmental Analysis

Figure 5.14-1

Fire, Police, and Sheriff Stations



- Clovis Police Department Station - 1233 Fifth Street
- Fresno County Sheriff Station - 5717 East Shields Avenue
- Clovis Fire Department Stations**
 - Station 1 - 633 Pollasky
 - Station 2 - 2300 Minnewawa
 - Station 3 - 555 N. Villa
 - Station 4 - 2427 Armstrong
 - Station 5 - 790 N. Temperance
- Fresno County Fire Protection Stations**
 - FCFPD Station 85 - 1392 Nees Avenue
 - FCFPD Station 86 - 4925 N. Nelson Avenue
- City Boundary
- Plan Area Boundary
- Sphere of Influence Boundary
- Urban Center Boundary



Environmental Impact Report

CLO-14.0 9.10.13

Source: City of Clovis, 2012; City of Fresno, 2011; Fresno County Sheriff's Office, 2013.

5. Environmental Analysis

PUBLIC SERVICES

This page intentionally left blank.

5. Environmental Analysis PUBLIC SERVICES

- Staffing levels should allow for (3) firefighters to arrive on all EMS calls for service within 6 minutes and 10 seconds, from receiving call at Secondary Public Safety Answering Point (PSAP) to arrival, 90% of the time, and
- Allow for 3 firefighters to arrive on all Fire, Haz Mat and Vehicle Accident type calls for service within 6 minutes and 30 seconds, from receiving call at Secondary PSAP to arrival, 90% of the time, and
- Allow for 16 firefighters to arrive on all single-family residential structures fires within 10 minutes and 30 seconds, from receiving call at Secondary PSAP to arrival, 90% of the time, and
- Allow for 19 firefighters to arrive on all commercial structure fires within 10 minutes and 30 seconds, from receiving all at Secondary PSAP to arrival, 90% of the time.
- Fire-station staffing should not be less than three sworn members: one Captain, one Engineer, and one Firefighter.

Current funding for CFD comes through the City's General Funds. Additionally, staff funding is augmented in growth areas (i.e., areas north of Herndon Avenue and east of Locan Avenue) by the existing Community Facilities District 2004-01, which provides funding for public safety operations (including fire and police services) in the City's growth areas. Although CFD has been recognized for great customer service satisfaction and received accreditation as a full-service fire department, the budget increases have not been commensurate with urban growth patterns and increased demand for service.

Performance Standards and Response Time

The most recent CFD response activity statistics for the years of 2010 to 2012 are summarized in Table 5.14-2. The data shows that the number of calls received for all issues have increased year by year.

Table 5.14-2 Response Statistics for CFD Fire Stations from 2011–2013

Year	Fires	Medical Calls	Other*	Total Calls
2011	191	5093	2723	8007
2012	372	5457	3592	9421
2013	352	5446	3434	9232
3-Year Average	305	5332	3250	8887

Source: Clovis Fire Department 2013.

* Other calls include good intent/service calls, hazardous materials/explosions, rescues and vehicle accidents, and false alarms/calls.

Performance measures are used to gauge the performance of CFD in responding to these calls. The CFD Standards of Cover 2013–2017 lists the three primary performance measures in terms of overall deployment and emergency response time:

- **First Unit Total Response Time (Fire):** The time from the call being received at the Primary 911 Public Safety Answering Point (PSAP) to the point at which the fire crew arrives on scene and action is initiated.

5. Environmental Analysis

PUBLIC SERVICES

- First Unit Total Response Time (EMS): The time from the call being received at the Primary 911 PSAP to the point at which the EMS crew arrives on scene and action is initiated.
- Effective Response Force Time (Fire): The time from the call being received at the Primary 911 PSAP to the point at which the fire crew arrives on scene and action is initiated with minimum amount of staffing and equipment specific to the type of emergency.

Table 5.14-3 shows the response time goals, 2012 performance, and 2010 to 2012 three-year average response times for each of these performance measures.

Table 5.14-3 Clovis Fire Department Response Times With Primary 911 PSAP Call Processing Included

Performance Measure	Response Goal (at 90% of the time)	2013 Performance (estimated at 90%)	5-Year, 2009–2013 Performance (estimated at 90%)
First Unit Total Response Time (Fire)	6 minutes and 55 seconds	7 minutes and 20 seconds	6 minutes and 58 seconds
First Unit Total Response Time (EMS)	6 minutes and 35 seconds	6 minutes and 41 seconds	6 minutes and 38 seconds
Effective Response Force Time (Fire)	10 minutes and 55 seconds	10 minutes and 28 seconds	11 minutes and 33 seconds

Source: Clovis Fire Department 2013.

CFD determines adequacy of service and effective response based on distribution and concentration of resources. “Distribution” describes the resource locations needed to minimize and terminate emergencies by securing a rapid, first-due response deployment. It is measured by the portion of the jurisdiction covered by first-due units within the adopted response time goals. “Concentration” describes the spacing of resources within proximity of one another to allow for sufficient rapid response that can assemble on scene within prescribed timeframes. CFD has conducted individual station location studies in the past to analyze its performance for determining the concentration and distribution of its resources. Figure 5.14-2, *Clovis Fire Department Stations and Service Areas*, illustrates the first response service areas of the five fire stations.

Future Facility Improvements

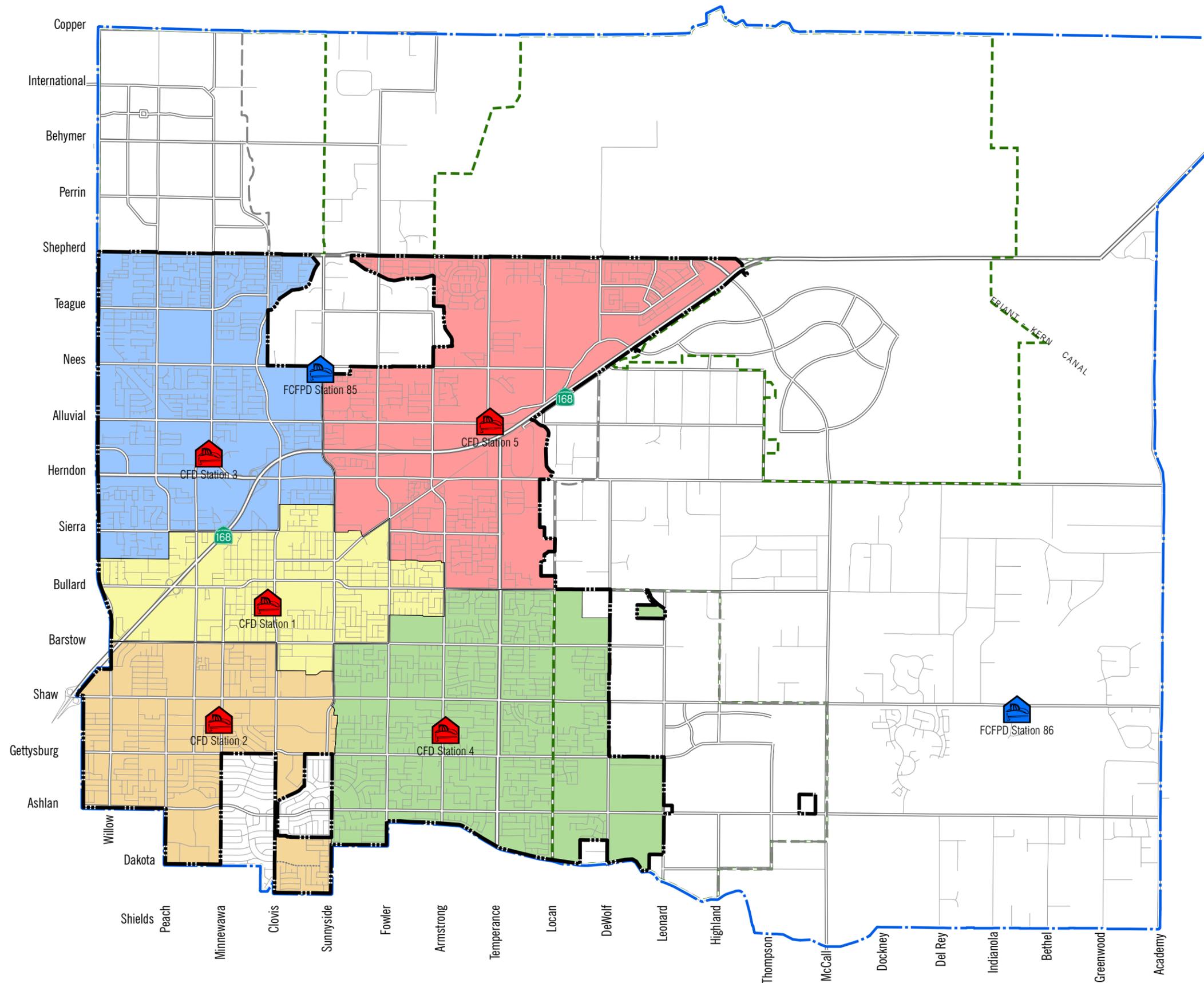
Capital improvements to physical infrastructure that support and sustain continued community development, such as new fire-station facilities, are scheduled for implementation through Clovis’ Five-Year Community Investment Program. The program does not provide funding for CFD staffing, but does provide for CFD improvements, such as remodeling and building new fire stations. The 2012–2013 Community Investment Program identified funding for the remodeling of Fire Station 3 and the police/fire training facility. The police/fire training facility has been completed, and Fire Station 3 is expected to be remodeled in 2013 to 2014.

According to the 2012–2017 Five-Year Community Investment Program, funding is also scheduled for the design and construction of two new fire stations in the northwest area and in the southeast area of the City’s SOI. These two new fire stations are proposed and budgeted for 2016 to 2017 or later. According to CFD, the process for development of the two stations has begun at a conceptual level, but will be processed differently based on land acquisition, current zoning designations, and projected population densities in the two areas. Currently, the City is looking toward property acquisition; however, nothing has been finalized (Fitzgerald 2014).

5. Environmental Analysis

Figure 5.14-2

Clovis Fire Department Stations and Service Areas



Clovis Fire Department Stations

-  Station 1 - 633 Pollasky
-  Station 2 - 2300 Minnewawa
-  Station 3 - 555 N. Villa
-  Station 4 - 2427 Armstrong
-  Station 5 - 790 N. Temperance

Fresno County Fire Protection Stations

-  FCFPD Station 85 - 1392 Nees Avenue
-  FCFPD Station 86 - 4925 N. Nelson Avenue

Fire Districts Service Areas

-  Station 1 - 633 Pollasky Avenue
-  Station 2 - 2300 Minnewawa Avenue
-  Station 3 - 555 North Villa Avenue
-  Station 4 - 2427 Armstrong Avenue
-  Station 5 - North Temperance Avenue

-  City Boundary
-  Plan Area Boundary
-  Sphere of Influence Boundary
-  Urban Center Boundary



CLOVIS

GENERAL PLAN

Environmental Impact Report

CLO-14.0 9.16.13



Source: City of Clovis, 2012.

5. Environmental Analysis

PUBLIC SERVICES

This page intentionally left blank.

5. Environmental Analysis

PUBLIC SERVICES

Funding

Aside from capital improvement funds, CFD also gets funding through development impact fees and private donations. Development impact fees pursuant to Chapter 4.10 of the City's municipal code states the City's requirements for placing development impact fees on urban development to ensure adequate fire service throughout the City as community growth requires. Through these City regulations, fire service impact fees are collected on residential, commercial, industrial, and public land uses, as described in Section 4.10.04. Pursuant to the City of Clovis Master Development Fee Schedule, effective July 15, 2013, the fire development impact fee is \$672 per unit. Unit is defined as either a "dwelling unit" or "dwelling unit equivalent." Definitions in the City's municipal code define "dwelling unit" as each single-family dwelling and each living unit of an apartment, duplex, multiple dwelling, structure, condominium, cooperative, or planned development, as defined in Section 11003 of the California Business and Professions Code, and each stall, space, site, or location for a mobile home or trailer intended for use as a separate habitation or residence. "Dwelling unit equivalent" is defined as each 1,500 square feet, or fraction thereof, of gross building area of assisted living facilities, churches, hospitals, and nonpublic schools, or 9,680 square feet, or fraction thereof, of gross lot acreage for hotel, motel, commercial, professional, and industrial development. For public school developments, including building facilities that are not portable or relocatable, a "unit" is defined as each 29,000 square feet, or fraction thereof, of gross acreage. These fees are collected and deposited in the Fire Department Fee Account and used solely to construct, equip, and furnish fire stations.

In addition, developments generally north of Herndon Avenue and east of Locan Avenue that are annexed into the existing Communities Facilities District 2004-01 are required to provide funding for public safety operations. As stated above in Section 5.14.1.1, *Environmental Setting*, the maximum annual tax will be \$213.76 for single family and \$184.57 for multifamily residential developments.

Fresno County Fire Protection District

The FCFPD provides fire services on the City's fringe and unincorporated areas in the City's SOI. FCFPD is one of five special districts in Fresno County that provides fire protection to the unincorporated county. The other four special districts are Bald Mountain Fire Department in Auberry, Fig Garden Fire Protection District in Sanger, North Central Fire Protection District in Fresno, and Orange Cove Fire Department in Orange Cove (Michaels 2013). FCFPD, the largest of the five districts, in cooperation with the California Department of Forestry and Fire Protection (CAL FIRE), provides fire services to roughly 2,655 square miles from 18 fire stations strategically located throughout the county.

As of December 2013, the CFD and FCFPD reinitiated an automatic aid agreement that was rescinded and reduced to a mutual aid agreement in 2008 due to negative financial impacts caused by ongoing litigation brought against the City by FCFPD over tax transition calculations (Despain 2013). Between 2008 and 2013, mutual aid cooperation between the two agencies was not adversely impacted; however, response times in certain areas were affected. Recently, legal matters between CFD and FCFPD have been settled and a new, tax-sharing agreement is now in place. Thus, negotiations began in June 2013 and resulted in a newly approved automatic aid agreement with newly detailed parameters (see Appendix K). Specifically, the automatic aid agreement defines dispatch parameters for the closest available resource to the scene of a fire or medical emergency within the defined automatic aid response area (see Figure 5.14-3, *Clovis and County Fire Automatic Aid Response Area*). Each agency agrees to send one fire company to fires

5. Environmental Analysis PUBLIC SERVICES

and Priority 1 medical emergencies with no fee charged. FCFPD will also agree to provide one fire company on an as-needed/as-available basis for fire station coverage during nonemergency activities (Despain 2013).

Fire Stations and Staffing

As shown in Figure 5.14-1, *Fire, Police, and Sheriff Stations*, there are currently two FCFPD fire stations that serve the Plan Area in the City (Station 85) and non-SOI Plan Area (Station 86). A summary of the equipment and staffing at these two stations is provided in Table 5.14-4.

Table 5.14-4 Fresno County Fire Stations Serving the Plan Area

Station	Address	Equipment	Staffing
North Clovis Station 85	1392 Nees Avenue, Clovis	Type I, Triple Combination Pumper (Fire Engine) ¾ Ton Command Vehicle	<ul style="list-style-type: none"> • 3 person crew • 1 career chief officer • Additional fire engine staffing by part-time paid call firefighters
Clovis Lakes Station 86	4925 N. Nelson Avenue, Clovis	Type I, Triple Combination Pumper (Fire Engine) Type I, Heavy Water Tender	<ul style="list-style-type: none"> • 2 person crew • Additional fire engine staffing by part-time paid call firefighters • Cross staffing between engine and water tender based on needs

Source: Bump 2013.

Performance Standards and Response Time

FCFPD is currently conducting a standard of cover analysis based on NFPA 1710 and 1720 standards. In accordance with NFPA standards of population density and response criteria, the Plan Area is designated “Rural.” As a target recommendation, NFPA suggests that agencies respond to service calls in rural areas within 10 minutes, 90 percent of the time. NFPA also has a minimum baseline standard of 13 minutes in rural areas. Table 5.14-5 compares the NFPA standards to FCFPD’s 2012 response times. FCFPD reaches and exceeds the baseline and target goal times by 98 and 91 percent, respectively. Thus, FCFPD is successfully reaching its target response time goals.

FCFPD’s current database is unable to differentiate between nonemergency and emergency calls; therefore, Table 5.14-5 reflects inflated response times because nonemergency and emergency call times are combined. In 2012, FCFPD’s median response time within the Plan Area was 7:48 minutes. Again, this median response time is considered excellent for the Rural Response Category, and it includes all nonemergency calls for service. Therefore, it is reasonable to assume that FCFPD’s actual median response time for emergency calls only (when lights and siren are activated) is actually better than the median time, which includes nonemergency (when lights and siren are not activated) calls that have a slower drive time, as warranted by the call type.

Table 5.14-5 FCFPD Response Times

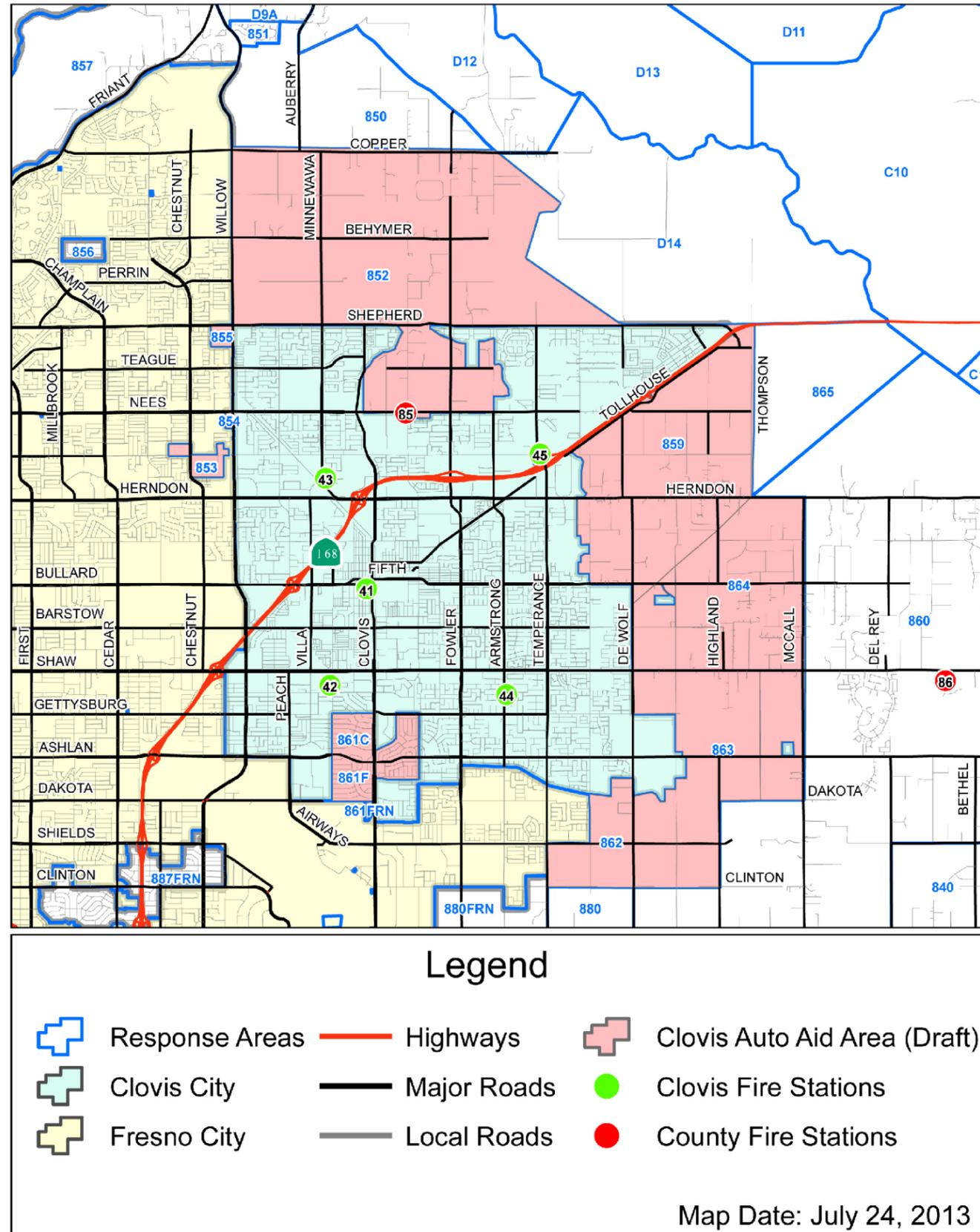
Performance Measure	Response Goal (at 90% of the time)	FCFPD Response Times
NFPA Baseline Standard	13 minutes	13 minutes at 98% of the time
NFPA Target Goal	10 minutes	10 minutes at 91% of the time

Source: Bump 2013.

5. Environmental Analysis

Figure 5.14-3

Clovis and County Fire Automatic Aid Response Area



Source: City of Clovis, 2013.



CLOVIS GENERAL PLAN

Environmental Impact Report



CLO-14.0 9.16.13

Not to Scale



5. Environmental Analysis

PUBLIC SERVICES

This page intentionally left blank.

5. Environmental Analysis
PUBLIC SERVICES

5.14.1.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- FP-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered facilities, need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services.

5.14.1.3 ENVIRONMENTAL IMPACTS

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

Table 5.14-6 compares the City’s current population statistics and buildout of the General Plan Update for the 2035 Scenario and Full Buildout.

Table 5.14-6 Comparison of Proposed Buildout Statistics to Existing Conditions

Scenario	Acres	Units	Household	Population	Employment	Building SF
Existing Conditions (2013)	47,805	42,000	40,500	115,000	31,500	13,050,000
City Boundary	14,859	36,500	35,000	100,000	30,000	12,600,000
SOI	5,633	2,000	2,000	6,000	1,000	200,000
Plan Areas beyond City and SOI	27,313	3,500	3,500	9,000	500	210,000
Proposed General Plan Update (2035 Scenario)	47,805	67,200	63,900	184,100	62,400	37,410,000
Increase over Existing	0	25,200	23,400	69,100	30,900	24,360,000
City Boundary	14,859	45,400	43,100	124,400	50,000	30,625,000
SOI	5,633	13,200	12,600	36,100	6,300	2,545,000
Plan Areas beyond City and SOI	27,313	8,600	8,200	23,600	6,100	4,240,000
Proposed General Plan Update (Full Buildout)	47,805	107,100	101,800	294,300	106,900	51,300,000
Increase over Existing	0	65,100	61,300	179,300	75,400	38,250,000
City Boundary	14,859	46,000	43,700	126,800	63,200	32,300,000
SOI	5,633	22,600	21,500	61,800	15,000	7,700,000
Plan Areas beyond City and SOI	27,313	38,500	36,600	105,700	28,700	11,300,000

5. Environmental Analysis

PUBLIC SERVICES

Impact 5.14-1: Development in accordance with the Clovis General Plan Update would introduce new structures, residents, and workers into the Plan Area, thereby increasing the demand for fire services served by the Clovis Fire Department and Fresno County Fire Protection District. [Threshold FP-1]

Impact Analysis:

2035 Scenario

The General Plan Update 2035 scenario estimates development of up to 25,200 housing units and 24,360,000 square feet of nonresidential space, resulting in approximately 69,100 more people and 30,900 more workers in comparison to existing conditions. With a substantial increase in residents and employees in the area, there would be a definite increase in demand for fire services.

In order to accommodate the growing boundaries of the City, CFD's service areas would need to be expanded across a larger geographic region by building three new fire stations farther out from the center of the City to respond to emergency calls along the outskirts of existing boundaries. As previously stated, there are two new fire stations currently budgeted into the City's Community Investment Program for the 2016 and 2017 fiscal year, with a third currently in a conceptual planning phase. Two of the fire stations would be outside of the existing City boundary's northwest and northeast corners. The location for one of the fire stations was recently annexed. By distributing these three stations closer to City's growth areas in anticipation of future development and population growth, CFD would be better able to provide for areas farther from the center of the City and improve its response times to all service areas across a larger geographic region (Despain 2014).

The proposed fire stations and equipment would be financed through the City's General Fund, which is primarily funded by revenue generated through properties and sales tax, with additional funding augmented by fees collected under Community Facilities District 2004-01. The City's General Fund would grow in rough proportion to the development of businesses and residential units anticipated with the buildout of the General Plan Update, and the fees collected by the Community Facilities District 2004-01 would grow as residential properties are individually annexed into the district. However, until tax revenue increases enough to build fire stations and afford the annual staffing and equipment costs to service the SOI and non-SOI Plan Area in the future, a service gap would be created.

As land is annexed by the City, primary fire-service responsibilities would be transferred from FCFPD to CFD. However, the automatic aid agreement between CFD and FCFPD should remain active. Thus, any emergency calls within the two agencies' automatic aid service area (as illustrated in Figure 5.14-3, *Clovis and County Fire Automatic Aid Response Area*) would be responded to by the closest available resource. Based on historical call volumes, it is likely that CFD would provide more services than FCFPD because of the denser population in Clovis than the SOI or non-SOI Plan Area (Despain 2013). To alleviate the disparate service, the FCFPD currently agrees to provide one fire company to CFD on an as-needed/as-available basis for fire station coverage during nonemergency activities as a parameter in the new automatic aid agreement, which was approved by the Clovis City Council in December 2013. Therefore, CFD should be able to provide greater coverage with the additional sixth fire company at no charge.

5. Environmental Analysis

PUBLIC SERVICES

However, noncontiguous development in the Plan Area is an issue of concern for the proposed General Plan Update. While it is assumed that development would most likely occur near existing neighborhoods within or near the City's existing jurisdictional boundary, development is permitted anywhere within the Plan Area under the proposed project, which would result in noncontiguous development. The adopted first unit response time standard for the City of Clovis requires all developments to be within approximately four minutes of travel from the nearest fire station. Any development outside of this four-minute travel area would receive a diminishing level of service the farther it lies outside of the travel area. Travel time is only a component of the total response time, but it is the largest single factor in effective response time. Another significant impact of noncontiguous development is on firefighter safety and property conservation. An effective response force represents the number of units and firefighters necessary to handle the critical task necessary within the first five to ten minutes of the fire attack. For a typical single-family home, an effective response force consists of 16 firefighters. During operations, if firefighters and associated equipment are delayed or have to travel longer distances, the operation will not be as successful. This would result in additional risk to firefighters and less-effective property conservation. Lastly, the effect of travel distance on unit availability would be impacted by noncontiguous developments. When a fire unit is dispatched to a call for service, it is no longer available for any other calls until its assignment is complete. While the fire unit would be committed to the call for service, the area it protects would experience a diminished level of service, but the time that the existing users are at risk may only be 20 minutes on average. When the fire unit has to respond to an incident perhaps twice as far away, the existing users are now subject to a diminished level of service that is also approximately double, or 30 to 40 minutes on average. In summary, the adverse impacts of noncontiguous development are directly proportional to the distance beyond the four-minute travel area of existing fire stations.

In order to address the concerns providing adequate service in the entire Plan Area (including noncontiguous developments), development impact fees would go toward initial capital expenses, including acquiring, equipping, and furnishing future fire facilities. The impact fees are collected on all proposed residential, commercial, industrial, office, and public land use developments pursuant to Section 4.10.04 of the City's municipal code. However, as stated above, the fiscal analysis indicates that the project would generate a balanced general fund budget only if the City manages the development of public facilities and the delivery of public services commensurate with the level of revenues. This assumes that the City reduces the delivery of services to existing public safety hot spots or the City generates more revenue from or reduces the costs of providing services to public safety hot spots. In order to do so, the City would need to regularly monitor and evaluate the level of service it provides and the revenues and costs associated with those services; analyze the fiscal implications of growth and development policies; and require the use of community facilities districts, developer prefunding, landscaping and lighting maintenance districts, business improvement districts, and other funding and financing mechanisms as necessary to ensure that sufficient revenues are generated to pay for the level of public facilities and services provided by the City and expected by residents and businesses. Thus, Mitigation Measure 14-1 is provided to ensure adequate funding mechanisms are available to the City to ensure public services maintain adequate levels of service through 2035.

In addition, Goal 6 under the proposed General Plan Update's Public Facilities and Services Element highlights the importance of "high quality emergency services that establish a real and perceived sense of safety and security for Clovis residents, businesses, and visitors." Policy 6.1 supports maintaining adequate staff, facilities, and training

5. Environmental Analysis

PUBLIC SERVICES

activities to effectively respond to emergency and public service calls; Policy 6.2 encourages periodical service level studies to analyze the Clovis Fire Department's performance; and Policy 6.3 recommends exploring other options for medical emergency calls. Interagency mutual aid and automatic aid agreements, effective communication, and community outreach are also emphasized as methods to strengthen CFD services (Policy 6.6, 6.7, and 6.9).

Furthermore, per Section 9.22.060 (Fire Protection) of the proposed Development Code Update, new projects shall be built per the currently adopted California Fire Code, related Municipal Code provisions, and current Clovis Fire Code Standards. This includes providing a hydrant system capable of meeting fire flows in compliance with ISO policy and Uniform Fire Code guidelines for fire flow, installing an automatic fire protection sprinkler system, establishing an emergency vehicle access route, etc.

Full Buildout

At full buildout, the General Plan Update would allow for the development of up to 65,100 additional housing units and 38,250,000 square feet of nonresidential space, resulting in up to 179,300 more people and 75,400 more workers in comparison to existing conditions.

The projected population would be more than double the existing population; therefore, additional fire services would be required in order for the CFD to adequately serve the City's fire protection needs. To meet current CFD's deployment standards, CFD would need to staff 89 to 95 firefighters and 11 non-sworn personnel to meet the needs of the City's new 126,800 residents (Despain 2014). This would require hiring 28 to 34 additional firefighters and 6 additional nonsworn personnel from existing conditions.

Furthermore, as stated above, as the City annexes land from the SOI and non-SOI Planning Areas, corresponding fire-service responsibility would be transferred from FCFPD to CFD. Thus, CFD would be responsible for serving a much larger geographic region along with the larger population, requiring at least three additional fire stations distributed to serve areas anticipated to be developed and annexed in the future. At this point, the geographic area of future development in the Plan Area at full buildout is uncertain. Therefore, it would be speculative to analyze the impacts of future fire service demands on specific CFD and FCFPD station service areas. It is only assumed that full buildout development would occur primarily in the City's SOI and non-SOI Plan Area, which is part of CFD and FCFPD's automatic aid service area. Areas along the west and south edges of the City of Clovis are also within the current CFD and Fresno Fire Department (FFD) automatic aid service area. Therefore, fire services would be provided by the closest appropriate station as the areas are developed, and service levels should not be adversely affected as long as the automatic aid agreements remain in effect and the cooperating fire agencies (FCFPD and FFD) maintain their current deployment capabilities.

However, it is uncertain how reliable CFD's automatic aid agreements would be at full project buildout, more than 50+ years from now. For example, FCFPD Station 85 is in the northern portion of the City with a protection area and demand for service that continues to shrink (see Figure 5.14-1, *Fire, Police, and Sheriff Stations*). Within a few years it may be cost prohibitive for FCFPD to continue to operate the station. FCFPD would likely look to the CFD and/or FFD to provide protection services under contract as a long-term solution. Furthermore, FFD shuttered six fire companies in 2008, which created more demand on CFD for assistance near the western and southern edges of Clovis. Therefore, while current automatic aid agreements operate well, they are not reliable

5. Environmental Analysis PUBLIC SERVICES

sources of adequate fire services in the future. CFD would need to anticipate service demands in new areas and plan accordingly to provide adequate service while utilizing the value of the automatic aid agreements in the meantime to ensure service levels do not drop below existing levels (Despain 2014).

Similar to the 2035 Scenario, fire protection services would be adversely impacted by the proposed project. Given the unreliable nature of the CFD's automatic aid agreement with neighboring fire agencies, availability of funding, and future noncontiguous developments at full buildout of the General Plan Update, impacts would be potentially significant.

5.14.1.4 RELEVANT GENERAL PLAN POLICIES AND DEVELOPMENT CODE SECTIONS

The following are relevant policies of the proposed Clovis General Plan and Development Code Update that would reduce potential impacts on fire services from future development in the Plan Area.

General Plan

Public Facilities and Services Element

Goal 6: High quality emergency services that establish a real and perceived sense of safety and security for Clovis residents, businesses, and visitors.

- **Policy 6.1 Fire and police service** - Maintain staffing, facilities, and training activities to effectively respond to emergency and general public service calls.
- **Policy 6.2 Resource allocation** - Periodically conduct service level studies to analyze crime and emergency service performance data, to evaluate the effectiveness of prevention and reduction strategies, and to allocate resources accordingly.
- **Policy 6.3 Emergency medical calls** - Explore options to lessen the demand on fire and police services or expand reimbursement programs to ensure the service pays for measured impacts.
- **Policy 6.6 Interagency support** - Participate in mutual aid system and automatic aid agreements to back up and supplement capabilities to respond to emergencies.
- **Policy 6.7 Interagency communications** - Maintain an effective communication system between emergency service providers within Clovis and neighboring jurisdictions.
- **Policy 6.9 Community outreach** - Conduct outreach in the community to promote personal and public safety in daily life and in cases of emergency. Regularly update and inform the public on the real levels of crime and safety to strengthen the perceived sense of personal security.

Development Code

- Article 3 (Development and Operational Standards), Division 9.22 (Performance Standards), Section 9.22.060 (Fire Protection)

5. Environmental Analysis PUBLIC SERVICES

5.14.1.5 EXISTING REGULATIONS

- International Fire Code
- California Health and Safety Code
- California Fire Code
- City of Clovis Municipal Code Section 4.10, Fire Facility Development Impact Fee

5.14.1.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

2035 Scenario and Full Buildout

Without mitigation, the following impact would be **potentially significant** for both 2035 Scenario and Full Buildout:

- **Impact 5.14-1:** Demand for fire services including facilities, equipment, personnel, etc., would increase as development occurs in accordance with the proposed General Plan Update.

5.14.1.7 MITIGATION MEASURES

Impact 5.14-1

2035 Scenario and Full Buildout

- 14-1 Proponents of noncontiguous development (defined as new development that, on all sides, is adjacent to or immediately across the street from vacant or agricultural land uses or other uses that do not have existing City water and sewer service) shall provide an analysis of the fiscal impacts of the proposed development. The analysis shall quantify to the satisfaction of the City, the likely and potential increase in capital costs and ongoing operations and maintenance costs over and above that expected from development that is contiguous. The project proponents shall provide for a funding mechanism to pay for the increase in costs associated with the development being noncontiguous, and the funding mechanism shall be in addition to the taxes and other funding sources used for development that is contiguous.

5.14.1.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant for the 2035 Scenario and Full Buildout.

5. Environmental Analysis PUBLIC SERVICES

5.14.2 Police Protection

5.14.2.1 ENVIRONMENTAL SETTING

Regulatory Background

City of Clovis Municipal Code

The City of Clovis Municipal Code identifies land use categories, development standards, and other general provisions that ensure consistency between the City's General Plan and proposed development projects. The following provisions from the City's Municipal Code focuses on police services impacts associated with new development projects and are relevant to the proposed project:

- **Title 4 (Public Safety), Chapter 4.11 (Police Department Fee):** Establishes a financing mechanism to construct, equip, and furnish police stations to serve the newly developed service areas around the City and its sphere of influence as community growth requires.

City of Clovis Community Facilities District 2004-01

Section 5.14.1.1, *Regulatory Background*, above discusses the intent and purpose of City's Community Facilities District 2004-01 in funding fire and police services in Clovis's growth areas, particularly those north of Herndon Avenue and east of Locan Avenue.

Existing Conditions

Clovis Police Department

The Plan Area is currently served by two police protection services. The Clovis Police Department (CPD) provides service within the existing City boundaries, and Fresno County Sheriff's Department (FCSD) and the California Highway Patrol provide police protection to the unincorporated areas of the Plan Area. The City has a mutual aid assistance agreement with both agencies. As shown on Figure 5.14-1, *Fire, Police, and Sheriff Stations*, the CPD headquarters, where all personnel are stationed and respond from, is at the Clovis Civic Center, 1233 Fifth Street. The City is divided into seven beats or service areas, as shown in Figure 5.14-4, *Clovis Police Department Beat Map*.

Department and Staffing

Currently, CPD has 96 sworn officers, a ratio of 0.97 sworn officers per 1,000 residents. In accordance with recommendations from the Police Department Master Service Plan and dependent on funding, CPD is anticipating to gradually increase its officer per 1,000 residents ratio to 1.3 sworn officers per 1,000 residents. The City of Clovis' 2013–2014 Annual Budget includes funding for two additional sworn police officers along with a new, in-house computer-aided dispatch and report management system. As development continues farther out toward the City's SOI and the non-SOI Plan Area, the City would annex the land, and police protection services would be transferred from FCSD to CPD. However, the mutual-aid assistance agreement with FCSD and the California Highway Patrol would remain active. In anticipation of the continued growth of the City's population and development, CPD has proposed future facilities to accommodate growth.

5. Environmental Analysis

PUBLIC SERVICES

CPD states that existing resources, including personnel, equipment, and facilities, are adequately serving the City under current conditions. This is due to the availability of non-sworn personnel to handle calls for service. However, certain divisions require more attention to proactively enforce. For example, personnel work overtime in specific divisions, such as traffic, gang/narcotics unit, general investigations, patrol, youth services, and records, in order to perform proactive enforcement on a regular basis. Additional personnel in these divisions would help CPD more adequately serve the City under current conditions.

Development fees pursuant to Chapter 4.11 (Police Department Fee) of the City's municipal code establish a method for coordinated acquisition and development of CPD facilities to ensure the provision of police and emergency services in the City and its SOI as community growth requires. This code allows the City to collect impact fees on residential, commercial, industrial, and public land use developments, as described in Section 4.11.04. Pursuant to the City of Clovis Master Development Fee Schedule, effective July 15, 2013, the police department fee is \$100 per unit. Unit is defined as either a "dwelling unit" or "dwelling unit equivalent." Section 4.11.03 defines "dwelling unit" as each single-family dwelling and each living unit of an apartment, duplex, multiple dwelling structure, condominium, cooperative or planned development as defined in Section 11003 of the California Business and Professions Code, and each stall, space, site, or location for a mobile home or trailer intended for use as a separate habitation or residence. "Dwelling unit equivalent" is defined as each 1,500 square feet, or fraction thereof, of gross building area of assisted living facilities, churches, hospitals, and nonpublic schools; or each 9,680 square feet, or fraction thereof, of gross lot acreage for hotels, motels, commercial, professional, and industrial development. For public school developments, including non-portable or non-relocatable building facilities, a "unit" is defined as each 29,000 square feet, or fraction thereof, of gross acreage. These police department fees are collected and deposited in the Police Department Fee Account to be used solely for constructing, equipping, and furnishing police stations; it should not be used for maintenance or upkeep of existing police department facilities.

Funding for the operations of CPD is provided through the General Fund, Community Investment Program funds, and state and federal grants. Similar to fire services, police personnel funding would be augmented by fees collected by the Community Facilities District 2004-01, which applies to properties within the district primarily in growth areas north of Herndon Avenue and east of Locan Avenue, to ensure new development in these areas farther away from the existing City limits have adequate police and fire protection services.

Performance Standards

Generally, CPD evaluates its performance based on call response times. Calls are categorized into three types of calls:

- Priority 1: Top priority emergency needing dispatch immediately
- Priority 2: Nonemergency, dispatch as soon as possible (i.e. cold reports of crimes, tows, etc.)
- Priority 3: Nonemergency, dispatch when possible (i.e. abandoned automobiles, parking matters, etc.)

5. Environmental Analysis

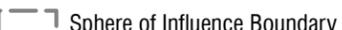
Figure 5.14-4

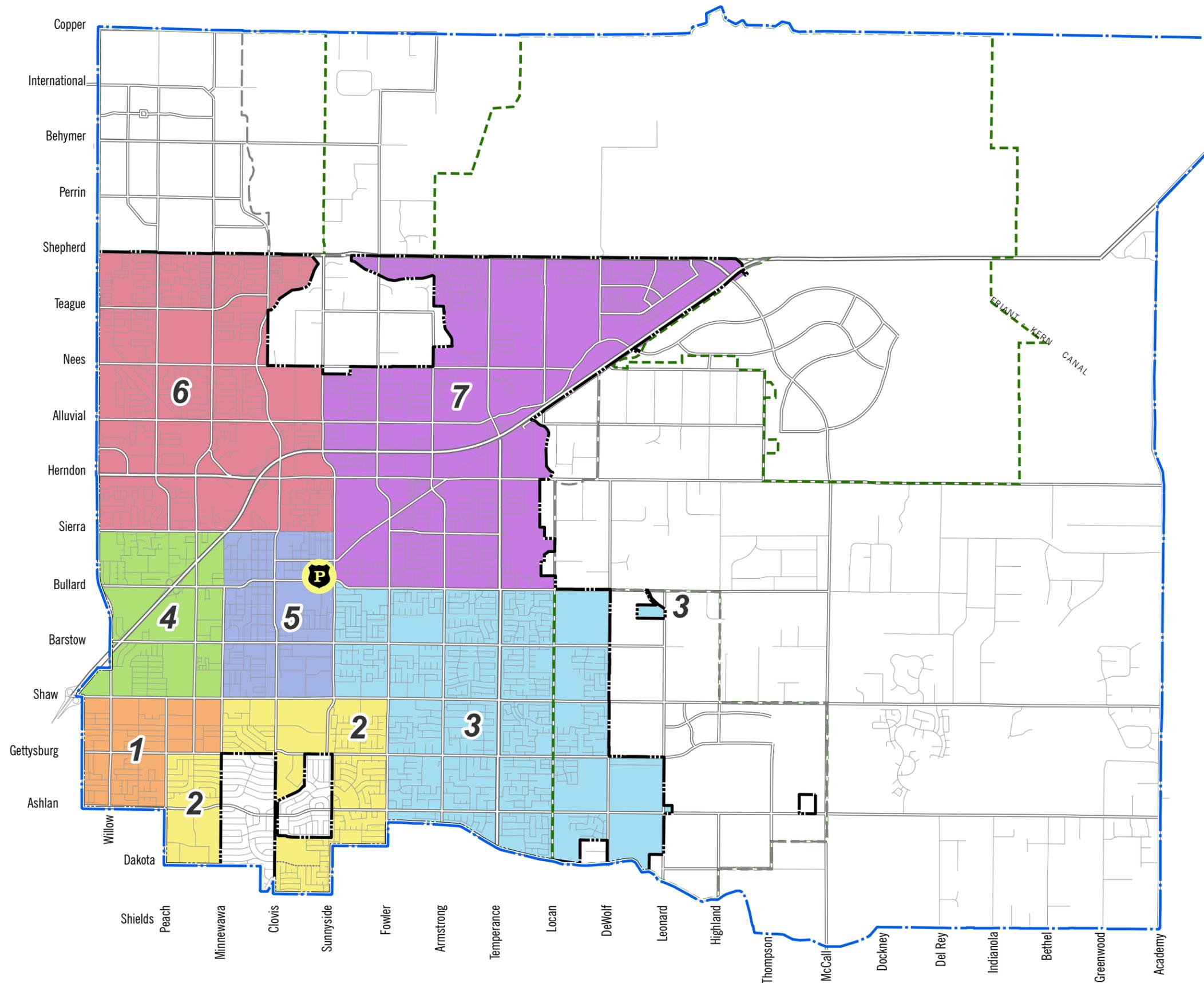
Clovis Police Department Beat Map

 Clovis Police Department Station - 1233 Fifth Street

Clovis Police Department Beats

-  Beat 1
-  Beat 2
-  Beat 3
-  Beat 4
-  Beat 5
-  Beat 6
-  Beat 7

-  City Boundary
-  Sphere of Influence Boundary
-  Plan Area Boundary
-  Urban Center Boundary

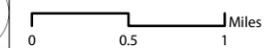


CLOVIS

GENERAL PLAN

Environmental Impact Report

CLO-14.0 9.16.13



Source: City of Clovis, 2012.

5. Environmental Analysis

PUBLIC SERVICES

This page intentionally left blank.

5. Environmental Analysis PUBLIC SERVICES

CPD's response time goal for Priority 1 calls is less than five minutes. Response time goals for Priority 2 and Priority 3 calls are within 15 and 30 minutes, respectively. However, CPD's current computer system is unable to obtain real time data of accurate individual response times. Therefore, CPD states that their Priority 1 response times are within the five-minute response goal. Depending on how many officers are available and how many calls are coming in, however, Priority 2 and Priority 3 call response times vary greatly.

Fresno County Sheriff's Department

Department and Staffing

FCSD is responsible for policing the unincorporated areas of Fresno County. Currently, the FCSD has two service areas that serve the Plan Area outside the City boundaries. Area II covers the area west of the Friant-Kern Canal, and Area IV covers the area east of the canal. Figure 5.14-5, *Fresno County Sheriff's Department Service Area*, shows the Area II substation at 5717 East Shields Avenue in the City of Fresno and its service area. Currently, the department has one sheriff, two assistant sheriffs, three sheriff captains, 13 lieutenants, 47 sergeants, 330 deputy sheriffs, and additional professional staff.

The FCSD is also responsible for the operation of three jail facilities for Fresno County. The jail facilities are all in the City of Fresno and have a combined capacity of approximately 2,100 inmates. Staffing for the jail facilities includes one correctional captain, eight correctional lieutenants, 35 correctional sergeants, 374 correctional officers, and additional professional staff.

FCSD determines adequate staffing and service based on the Fresno County General Plan's staffing standard of two sworn personnel per 1,000 residents. However, the standard does not account for correctional staff needed to serve the jail facilities or professional staff needed for dispatch, recordkeeping, and other administrative work. FCSD's existing 396 sworn personnel for the county's population generates 0.42 sworn personnel per 1,000 residents, which is below the county's General Plan standard.²

Multiple public facilities development fees are collected by FCSD from new residential, retail, office, and industrial and warehouse developments based on their geographical location in cities and unincorporated county areas. The facilities development fee rates are different per city and are published annually by the Fresno County Public Works Department. Pursuant to the County's Code of Ordinances Chapter 17.90, the schedule of fees indicates different payments based on land use development type. Table 5.14-7 reflects the development fees collected to mitigate demand for FCSD services that comes from new development and its associated police demands. According to Section 17.90.080 of the County's Code of Ordinances, these public facilities fees shall be used for the design, planning, construction, equipping, expanding, improving, and adding of sheriff facilities.

² The 0.42 sworn personnel per 1,000 residents staffing ratio was found by using the 2012 Fresno County population of 947,895 residents, per the US Census Bureau.

5. Environmental Analysis

PUBLIC SERVICES

Table 5.14-7 FCSD Public Facilities Fees

Land Use	Fee (per dwelling unit)
Residential	
Single-family	\$257
Multifamily	\$189
Nonresidential	
Retail	\$40
Office	\$58
Industrial	\$19
Warehouse	\$22

Source: Fresno County Code of Ordinances 2013.

Other funding sources for developing new facilities and services include County General Fund monies, grant monies (from federal, state, and Indian sources), and contracts and fees (taxes). Staffing salaries are funded through the County's General Funds.

Performance Standards

The FCSD has four performance standards for different calls for service:

- Priority 1: Top priority, emergency, in-progress calls 3 minutes
- Priority 2: Nonemergency, dispatch as soon as possible 20 minutes
- Priority 3: Nonemergency, dispatch when possible 3 hours
- Priority 4: No suspect, insurance/information only, on-line reports 24 hours

Table 5.14-8 provides the goal times and average response times for calls placed between April 2012 and April 2013 based on priority call type. As shown by the table, response time standards for the most urgent and emergency calls, Priority 1 and 2, are currently not being met.

Table 5.14-8 Average FCSD Response Times

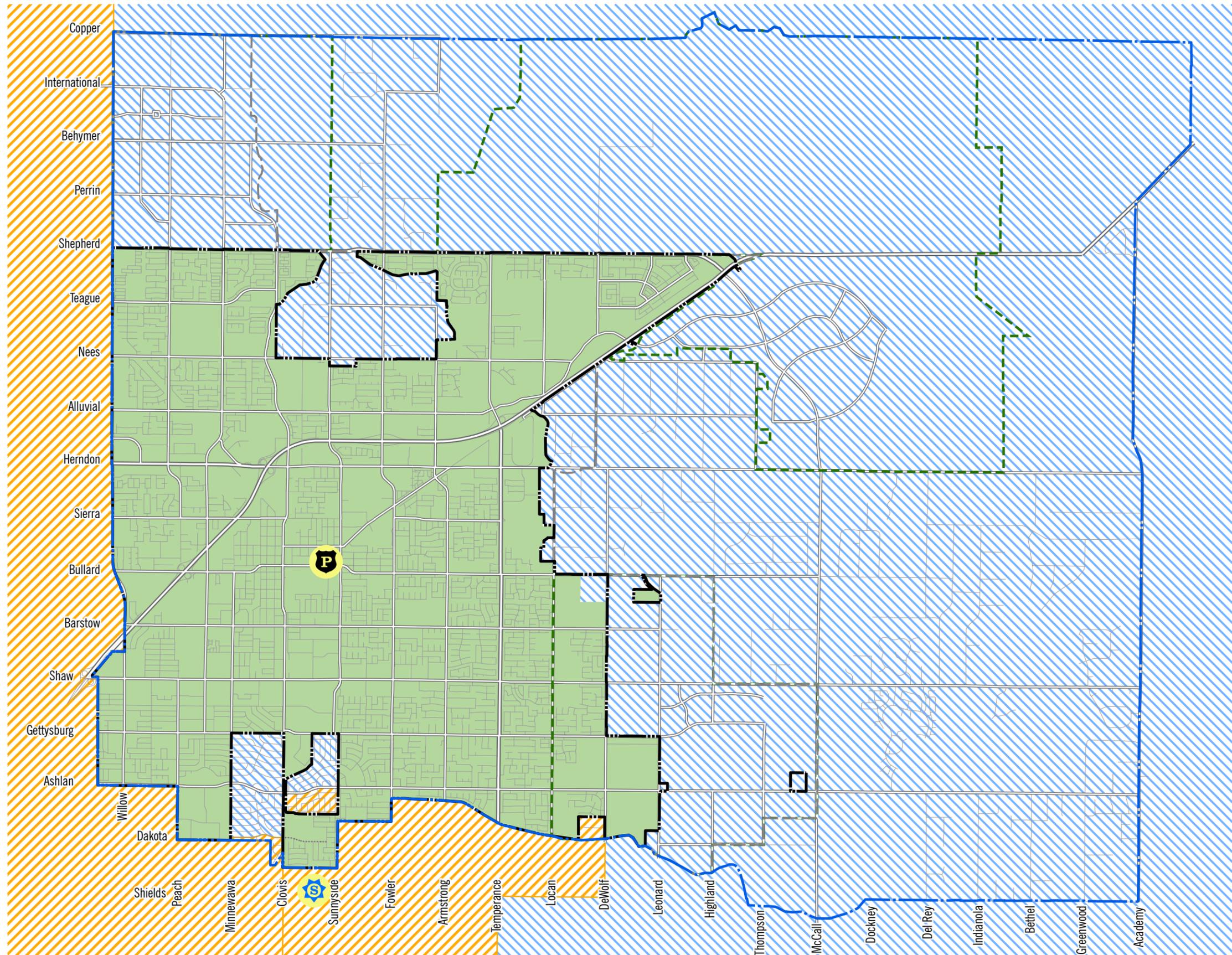
Call Type	Response Goal Time	Average Response Time
Priority 1	3 minutes	12.9 minutes
Priority 2	20 minutes	57.8 minutes
Priority 3	3 hours	75.1 minutes (1.25 hours)
Priority 4	24 hours	296.1 minutes (4.94 hours)

Source: Horton 2012.

5. Environmental Analysis

Figure 5.14-5

Fresno County Sheriff's Department Service Area



-  Clovis Police Department Station - 1233 Fifth Street
-  Fresno County Sheriff's Station - 5717 East Shields Avenue
-  Clovis Police Department Service Area
-  Fresno County Sheriff's Department Service Area
-  Fresno Police Department Service Area
-  City Boundary
-  Sphere of Influence Boundary
-  Plan Area Boundary
-  Urban Center Boundary

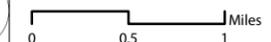


CLOVIS

GENERAL PLAN

Environmental Impact Report

CLO-14.0 9.10.13



5. Environmental Analysis

PUBLIC SERVICES

This page intentionally left blank.

5. Environmental Analysis PUBLIC SERVICES

5.14.2.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- PP-1 Result in a substantial adverse physical impact associated with the provisions of new or physically altered facilities, need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services.

5.14.2.3 ENVIRONMENTAL IMPACTS

Impact 5.14-2: Development in accordance with the Clovis General Plan Update would introduce new structures, residents, and workers into the Clovis Police Department and Fresno County Sheriff's Department service areas, thereby increasing the demand for police protection services. [Threshold PP-1]

Impact Analysis

2035 Scenario

The 2035 Scenario of the General Plan Update estimates development of up to 25,200 housing units and 24,360,000 square feet of nonresidential space. The increase in development would result in up to 69,100 more residents and 30,900 more workers in the City, SOI, and non-SOI Plan Areas.

As development continues to grow into the SOI and non-SOI Plan Areas, the land would be annexed from the county to the City, thereby transferring police protection responsibilities from FCSO to CPD. Though the main responsibility would be transferred to CPD, FCSO would continue supporting CPD through their mutual aid agreement, as needed, by providing additional personnel and equipment during and after the transitional period. Nevertheless, CPD would receive a substantial geographic region to serve compared to its existing service boundaries.

According to CPD, the 2035 scenario would require additional facility space and personnel at the headquarters. The geographic size of CPD's service areas would also require the addition of at least two beats or service areas, which translates to a minimum of 12 officers and 4 community service officers. In addition, there would be a need for increased personnel in the gangs, narcotics, investigations, records, and traffic divisions. Additional supervision, such as patrol lieutenants, would be required as well. Overall, there would need to be an increase of approximately 25 officers and 15 civilian staff positions. More equipment and vehicles would be needed for the added personnel. CPD states that the personnel numbers and needs could vary greatly based on the actual increase in crime once buildout occurs, so these numbers could be higher or lower. CPD's Master Service Plan also suggests maintaining a ratio of 1.3 sworn officers per 1,000 residents. Therefore, the 2035 scenario would require 240 total sworn officers, which is an increase of 128 sworn officers from existing conditions. This

5. Environmental Analysis

PUBLIC SERVICES

suggested ratio is ideal and based heavily on the availability of funding, so actual personnel needs would probably be scaled down based on realistic availability of funding.

In addition, similar to fire services, potential impacts of noncontiguous development in the non-SOI Plan Area could pose several challenges for CPD and concerns for future residents when purchasing homes in areas outside the more developed City areas. Response times to noncontiguous residences would be greater given the greater travel distances, which not only delays help for the specific call, but would also increase CPD's total response time average when responding to other service calls. Longer response times would thin existing resources due to the increased distance an officer has to travel back to assist on other calls or when other officers need assistance. Proactive policing would also be a challenge for noncontiguous development. For example, officers typically patrol within the urban City limits and may neglect policing a small area two miles out of Clovis, which still falls under the City's jurisdiction. In this case, the only response would be reactive when the resident calls for service. The lack of proactive policing and visual presence would potentially lead to increased crime in the noncontiguous development areas. Adequate and reliable funding would be required to maintain effective police services throughout the Plan Area. Public facilities impact fees would be collected on all proposed residential, retail, commercial, industrial, and warehouse land use developments as the City continues expanding, pursuant to Chapter 4.11 (Police Department Fee) of the City's municipal code. The police department fees would fund the required increase in facility space and improvements to the CPD headquarters. The fees would be a condition of approval for final maps, conditional use permits, site plans, and/or building permits and are adjusted on an annual basis to reflect actual police station construction and equipment costs to ensure developers are paying a proportionate share of the cost to fund the City's growing police needs as development continues in the City.

In addition, sales and property tax collected from all business and residential uses anticipated to be developed in accordance with the General Plan Update would gradually increase and contribute to the City's General Funds. CPD would use the increased funds for hiring additional professional staff and police officers. Annual fees collected by the Community Facilities District 2004-01 would also provide additional funds for police personnel.

Similar policies as described in Impact 5.14-1 under the proposed General Plan Update's Public Facilities and Services Element are also related to provide adequate police services to Clovis's residents (Policies 6.1 through 6.3, 6.5, 6.6, 6.7, and 6.9). These policies fall under Goal 6 of the public facilities and services element, which stresses the importance of providing "high quality emergency services that establish a real and perceived sense of safety and security for Clovis residents, businesses, and visitors." Policies address maintaining adequate staffing, facilities, and training activities (Policy 6.1); conducting periodic service level studies to ensure effective resource allocation (Policy 6.2); exploring options to reduce calls for service (Policy 6.3); improving enforcement of public safety "hot spots" (Policy 6.5); participating in interagency mutual or automatic aid systems and maintaining effective interagency communication (Policies 6.6 and 6.7); and regularly conducting community outreach to promote public safety knowledge (Policy 6.9).

Nevertheless, the fiscal impact analysis prepared for the proposed General Plan Update concludes that a balanced general fund budget can be achieved only if the City manages the development of public facilities and the delivery of public services commensurate with the level of revenues. Availability of funding to serve future developments at full buildout of the General Plan Update beyond those described above is also uncertain. According to the CPD, a single-family residential development with 105 units with an average annual tax base of \$3,200 would not

5. Environmental Analysis PUBLIC SERVICES

sufficiently fund the necessary staffing level increases needed to adequately patrol areas in the SOI and non-SOI Plan Area. Although this development would generate approximately \$336,000 in taxes, all the funds would not go directly to safety services, which include both fire and police services. Only a percentage would be deposited into the City's General Fund. Further, while the existing Communities Facilities District 2004-01 would collect fees from residential developments annexed into the district, it is uncertain whether these funds would be adequate to support both police and fire services across the entire project area. To patrol areas in the Plan Area, especially areas of noncontiguous development, the CPD would need to add five officers, even if only one officer per shift, at a cost of over \$100,000 per officer. In order to maintain response times within the goals of the CPD, a new beat would also need to be added as development occurs in the non-SOI Plan Area. Until such funding can provide for the staffing requirement of a new beat in the non-SOI Plan Area, the area would not receive the same coverage or response times as areas closer to the City's center.

Given unreliable sources of funding from police department fees and City's General Funds to maintain adequate levels of police services, development in accordance with the proposed General Plan Update would have a potentially significant impact on police services.

Full Buildout

The implementation of the General Plan Update at full buildout would introduce an estimate of up to 65,100 housing units and 38,250,000 square feet of nonresidential space, resulting in up to 179,300 new residents and 75,400 new workers to the CPD and FCSD service area. As the 2035 scenario suggests, the increase in structures, residents, and workers in the area would require additional sworn personnel (including police officers and professional staff), additional police stations, and improvements or expansions of existing stations in order to adequately serve the larger population.

The number and location of sheriff and police stations required to adequately serve the projected full buildout population are dependent on where and when the development would occur geographically, which cannot be determined specifically at this point. Therefore, it would be speculative to analyze the impacts of future police service demands on specific CPD and FCSD station service areas.

Similar to the 2035 Scenario, police protection services at full buildout of the proposed General Plan Update would be adversely impacted by the proposed project. Given the unreliable availability of funding and potential for future noncontiguous development in accordance with the General Plan Update, impacts to police services at full buildout of the proposed project would be potentially significant.

5.14.2.4 RELEVANT GENERAL PLAN POLICIES AND DEVELOPMENT CODE SECTIONS

The following are relevant policies of the proposed Clovis General Plan and Development Code Update that would reduce potential impacts on police services from future development in the Plan Area.

5. Environmental Analysis

PUBLIC SERVICES

General Plan

Public Facilities and Services Element

Goal 6: High quality emergency services that establish a real and perceived sense of safety and security for Clovis residents, businesses, and visitors.

- **Policy 6.1 Fire and police service** - Maintain staffing, facilities, and training activities to effectively respond to emergency and general public service calls.
- **Policy 6.2 Resource allocation** - Periodically conduct service level studies to analyze crime and emergency service performance data, to evaluate the effectiveness of prevention and reduction strategies, and to allocate resources accordingly.
- **Policy 6.3 Emergency medical calls** - Explore options to lessen the demand on fire and police services or expand reimbursement programs to ensure the service pays for measured impacts.
- **Policy 6.6 Interagency support** - Participate in mutual aid system and automatic aid agreements to back up and supplement capabilities to respond to emergencies.
- **Policy 6.7 Interagency communications** - Maintain an effective communication system between emergency service providers within Clovis and neighboring jurisdictions.
- **Policy 6.9 Community outreach** - Conduct outreach in the community to promote personal and public safety in daily life and in cases of emergency. Regularly update and inform the public on the real levels of crime and safety to strengthen the perceived sense of personal security.

5.14.2.5 EXISTING REGULATIONS

- County of Fresno Code of Ordinances Section 17.90.080 (Uses of the Fee)
- City of Clovis Municipal Code Chapter 4.11 (Police Department Fee)

5.14.2.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

2035 Scenario and Full Buildout

Without mitigation, the following impact would be **potentially significant** for both 2035 Scenario and Full Buildout:

- **Impact 5.14-2:** Demand for police services including facilities, equipment, personnel, etc., would increase as development occurs in accordance with the proposed General Plan Update.

5. Environmental Analysis PUBLIC SERVICES

5.14.2.7 MITIGATION MEASURES

Impact 5.14-2

2035 Scenario and Full Buildout

Mitigation Measure 14-1 would apply to this impact.

5.14.2.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

2035 Scenario and Full Buildout

Impacts would be less than significant for the 2035 Scenario and Full Buildout.

5.14.3 School Services

5.14.3.1 ENVIRONMENTAL SETTING

Regulatory Background

State

California State Assembly Bill 2926: School Facilities Act of 1986

To assist in providing school facilities to serve students generated by new development, Assembly Bill (AB) 2926 was enacted in 1986 and authorizes a levy of impact fees on new residential and commercial/industrial development. The bill was expanded and revised in 1987 through the passage of AB 1600, which added Sections 66000 et seq. to the Government Code. Under this statute, payment of impact fees by developers serves as CEQA mitigation to satisfy the impact of development on school facilities.

California Senate Bill 50

Senate Bill (SB) 50, passed in 1998, provides a comprehensive school facilities financing and reform program and enables a statewide bond issue to be placed on the ballot. Under the provisions of SB 50, schools districts are authorized to collect fees to offset the costs associated with increasing school capacity as a result of development and related population increases. The funding goes to acquiring school sites, constructing new school facilities, and modernizing existing school facilities. SB 50 establishes a process for determining the amount of fees developers would be charged to mitigate the impact of development on school districts from increased enrollment. According to Section 65996 of the California Government Code, development fees authorized by SB 50 are deemed to be “full and complete school facilities mitigation.”

Under this legislation, there are three levels of developer fees that may be imposed upon new development by the governing school district. Level I fees are assessed based upon the proposed square footage of residential, commercial/industrial, and/or parking structure uses. Level II fees require the developer to provide one-half of the costs of accommodating students in new schools, and the state provides the remaining half. To qualify for Level 2 fees, the governing board of the school district must adopt a School Facilities Needs Analysis and meet other prerequisites in accordance with Section 65995.6 of the California Government Code. Level III fees apply

5. Environmental Analysis PUBLIC SERVICES

if the state runs out of bond funds, allowing the governing school district to impose on the developer 100 percent of the cost of school facility or mitigation minus any local dedicated school monies.

Existing Conditions

Three school districts cover the Plan Area of the General Plan Update, Clovis Unified School District (CUSD), Fresno Unified School District (FUSD), and Sanger Unified School District (SUSD). CUSD, FUSD, and SUSD all have elementary, middle, and high schools. The school locations and district boundaries are shown on Figure 5.14-6, *Existing Schools and Library Locations*.

Clovis Unified School District

CUSD serves more than 40,000 students and has approximately 48 total schools, including 32 elementary schools, 5 middle schools, 5 high schools, 4 alternative education schools, and 2 specialty schools (Center for Advanced Research and Technology and the Sierra Outdoor School). Table 5.14-9 shows the districtwide capacity for elementary, middle, and high schools and compares it with the current enrollment. All school levels are within capacity; however, the current elementary school enrollment level is just over capacity.

Table 5.14-9 Current Capacity Conditions for CUSD Schools

School Level (Districtwide)	Capacity	Enrollment for 2013–2014 Academic Year	Remaining Capacity
Elementary Schools (Grades K–6)	21,183	21,698	(515)
Middle Schools (Grades 7–8)	7,064	6,367	697
High Schools (Grades 9–12)	14,107	12,611	1,496
Total	42,354	40,676	1,678

Source: Ulrich 2014.

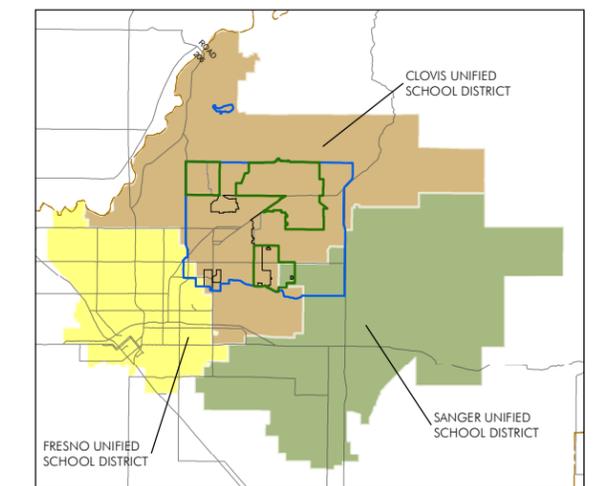
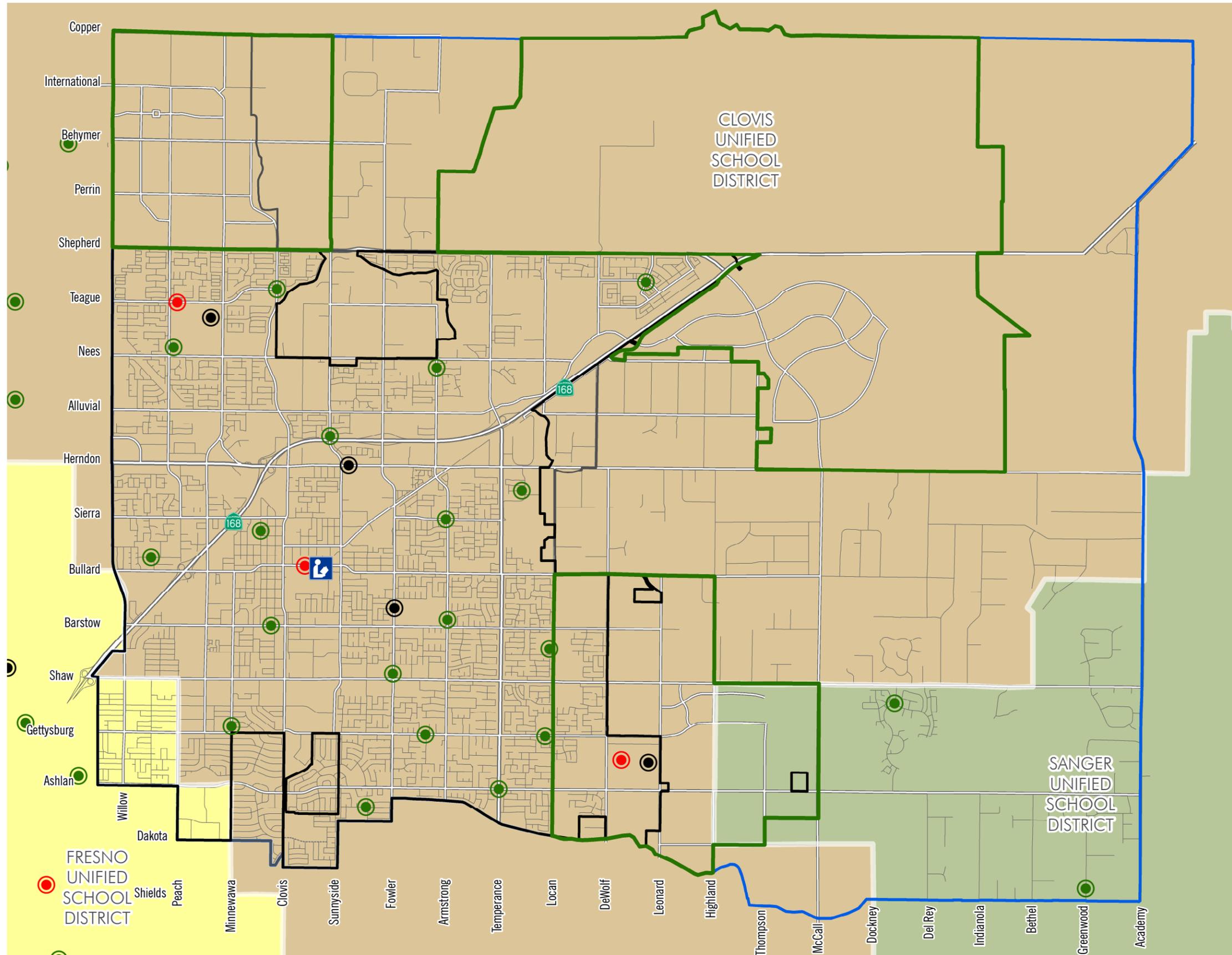
CUSD’s 2014 Facilities Master Plan documents existing school facilities’ needs, enrollment projections, and new school facility needs. The enrollment district wide was projected to increase from 40,676 in 2013–2014 to 47,978 in 2023–2024, over the 10-year period. This is an average growth rate of 1.66 percent per year. Projected enrollments in 2023 based on school levels are: 25,089 in grades K–6; 7,614 in grades 7–8; and 13,634 in grades 9–12. These have a growth rate of 1.65, 1.97, and 1.57 percent per year, respectively.

Using these enrollment projections, CUSD determines that the district may need four more elementary schools by 2023 in addition to an elementary school currently in the design process to be located at Temperance and Clinton Avenue in the City of Fresno. Another area of overcapacity concern is the north Clovis area, where three elementary schools are projected to be significantly overcapacity by 2018. It is projected that either a new elementary school would need to be constructed in this area, or CUSD would have to change the attendance area boundaries to better utilize available capacity in existing schools in the Clovis West and Clovis High areas.

5. Environmental Analysis

Figure 5.14-6

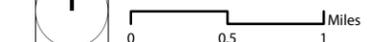
Existing Schools and Library Locations



CLOVIS GENERAL PLAN

Environmental Impact Report

CLO-14.0 9.24.13



Source: Fresno County, 2007; California Department of Education, 2013.

5. Environmental Analysis

PUBLIC SERVICES

This page intentionally left blank.

5. Environmental Analysis PUBLIC SERVICES

Projected enrollment in intermediate schools indicates that a new intermediate school would be needed by the 2023-24 school year at the earliest. High school enrollment projections show that the high schools would not reach overcapacity; however, they would reach above the average enrollment capacity. To utilize the capacity of all CUSD high schools, attendance boundaries and school feeder patterns may be changed during the 10-year span of 2014-2024.

Measure A passed in 2012 and gave CUSD a \$298 million school bond that allowed CUSD to modernize outdated schools and classrooms, upgrade building conditions, improve technology access to students, and complete new school constructions. Additional funding for CUSD facilities needs are anticipated to come from future local and state bond measures, projected developer fee revenue, and interest on investments.

Fresno Unified School District

FUSD serves more than 73,000 students with approximately 100 schools, including 62 elementary schools, 18 middle schools, 12 high schools, and 8 other educational facilities (i.e. adult schools, continuation schools, and schools for students with disabilities). FUSD covers the City of Fresno and a small portion of Clovis in the northeastern portion of the district. This small portion of Clovis is in the service area of Viking Elementary School, Ahwahnee Middle School, and Hoover High School. Table 5.14-10 shows that each of these schools is currently operating within capacity.

Table 5.14-10 Current Capacity Conditions of FUSD Schools Serving the City of Clovis

School and Location	Capacity Permanent Buildings	Capacity Portable Buildings	Total Capacity	Enrollment (2012-2013)	Remaining Capacity
Viking Elementary School 4251 North Winery Avenue (Grades K-6)	611	295	906	715	191
Ahwahnee Middle School 1127 East Escalon Avenue (Grades 7-8)	1,046	NA	1,046	647	399
Hoover High School 5500 North First Street (Grades 9-12)	1,850	462	2,312	1,784	528

Source: LeBlanc 2013.

FUSD's 2009 Facilities Master Plan focuses on clarifying and revising the feeder pattern for high schools. The feeder pattern indicates which elementary and middle schools will feed into which high school in the district. Ahwahnee Middle School currently feeds into Hoover High School, and Viking Elementary School feeds into another middle school not in the Plan Area. The FUSD Facilities Master Plan proposes Ahwahnee Middle School to convert from a 7-8 grade level into a 5-8 grade level in order to accommodate the growing population in this region of the district. By doing so, it would open choices for students in the region to go to either Ahwahnee Middle School (proposed 5-8) or Tioga Middle School (7-8), which would both feed into Hoover High School.

FUSD standards promote equity and consistency throughout the district. The key standards are summarized in Table 5.14-11.

5. Environmental Analysis

PUBLIC SERVICES

Table 5.14-11 FUSD Facilities Master Plan Key Standards

Facility Level	Grade Configuration	Standard Class Size	Optimum School Size	Room Size
Elementary	Preschool/ Kindergarten (PK)–6	PK–3 : 20 4–6: 30	650 – 750	PK–K: 1,350 SF 1–6: 960 SF Art/Music: 960–1,200 SF
Middle	5–8 or 7–8	29	700–1,000	General Classroom: 900 SF General Lab: 1,300 SF Art: 1,200–1,500 SF Career-Technical Education: 2,000 – 2,500 SF
High	9–12	31	2,100–2,600	General Classroom: 900 SF General Lab: 1,300 SF Art: 1,200–1,500 SF Career-Technical Education: 2,500–3,000 SF

Source: Fresno Unified School District Facilities Master Plan 2009.

The FUSD standards show that Viking Elementary School is too large, with a capacity of 906, substantially over the optimum elementary school size of 650 to 750. If Ahwahnee Middle School is converted into a 5–8th grade school as proposed in the Facilities Master Plan, it would give students a choice of continuing at Viking Elementary or transferring early to Ahwahnee Middle School, where there is a larger remaining capacity.

Measure Q was approved by the Board of Education in 2010 and gave FUSD a \$280 million bond for upgrades and improvements to all schools in the districts. Ahwahnee Middle School received \$500,000 from the bond to upgrade core facilities; improve storage; repair landscaping, paving, and irrigation systems; and enhance campus curb appeal with exterior improvements. Hoover High School received \$14 million for an architected campus master plan, portable improvements, and building renovations. The three schools also received shares in the general, districtwide allocation for maintenance funds, technology upgrades, community/joint use projects, and special-education accommodations.

Sanger Unified School District

SUSD has approximately 10,783 students in 14 elementary schools, 1 middle school, 3 high schools, 1 community day school, and 1 adult school. It covers the City of Sanger; the communities of Centerville, Del Rey, Fairmont, Lone Star, and Tivy Valley; and portions of the Sunnyside area of the City of Fresno. The western boundary of the district extends to cover a portion of the Plan Area. There are three schools that would cover a portion of the proposed Plan Area of the General Plan Update. Table 5.14-12 shows these three schools and their current enrollment conditions. Two of the schools, Fairmont Elementary School and Washington Academic Middle School, are within current capacities. Sanger High School is not operating within its current capacity.

SUSD’s 2012 Facilities Master Plan documents existing school facilities’ needs, enrollment projections, and new school facility needs. According to SUSD’s enrollment projections for the next 10 years, the total district enrollment will increase by 3,100 students, with an average growth rate of 2.54 percent per year. Projected enrollments for 2022 are: 1,243 students at Fairmont Elementary School; 2,111 students at Washington Academic Middle School; and 3,399 students at Sanger High School. These have a growth rate of 1.83, 2.95, and 2.35 percent, respectively.

5. Environmental Analysis
PUBLIC SERVICES

Table 5.14-12 Current Capacity Conditions for SUSD Schools Serving the City of Clovis

School and Location	Total Capacity	Enrollment for 2012–2013 Academic Year	Remaining Capacity
Fairmont Elementary School 3095 North Greenwood (Grades K–8)	639	481	158
Washington Academic Middle School 1705 Tenth Street (Grades 6–8)	1620	1566	54
Sanger High School 1045 Bethel (Grades 9–12)	2430	2663	(233)

Source: Sepulveda 2012.

Fairmont Elementary School is a school serving the more rural areas of SUSD, and it is assumed that development would occur at a slower pace than other areas within the SUSD boundary. Therefore, enrollment is projected to remain below the district-defined operational capacity for the SUSD Facilities Master Plan’s 10-year project period. Washington Academic Middle School, however, is the only middle school in the district and is anticipated to reach overcapacity by 2013–2014. It is anticipated to continue experiencing increasing enrollment demand; thus, the SUSD Facilities Master Plan hopes to alleviate the demand by budgeting for a new middle school by 2016. Sanger High School is the only comprehensive high school in the district and is currently operating over capacity. SUSD is currently in the process of acquiring a future high school/middle school site in the southeast area of the district to meet the needs of existing and future developments in southeast Fresno and southern Clovis areas. The timing for a new high school is dependent on the timing of the new middle school, based on the extent to which the middle and high school programs share facilities and integrate shared programs. It will be difficult to construct both a middle and high school at the same time since there would be insufficient initial enrollment for a full middle and high school. However, the SUSD Facilities Master Plan states 2016 as a reasonable target year for the addition of some type of middle/high school capacity to relieve future capacity issues at Washington Academic Middle School and Sanger High School.

SUSD anticipates funding to come from local funding options, general obligation bonds, the state School Facility Program (SFP), federal funding opportunities, grants for capital facility projects, and existing current capital funds available to SUSD. SUSD is currently eligible for the New Construction Program and Modernization Program within the SFP that provides funding on a 50/50 and 60/40 state and local match basis, respectively.

School Development Impact Fees

Senate Bill 50 (SB 50) offers comprehensive school facilities financing and reform program. The bill allows the state to provide funding to school districts for school site acquisitions, new school facilities construction, and existing school facilities improvements. Under this legislation, school districts can charge developer fees to mitigate the impact of development on school facilities from increased enrollment. It was established by the legislature to constitute “full and complete mitigation of the impacts” on the provision of adequate school facilities (Government Code § 65995[h]). SB 50 also relieves jurisdictions from having the authority of denying approval of a legislative or adjudicative action under CEQA in reference to real estate development based upon

5. Environmental Analysis

PUBLIC SERVICES

the inadequacy of school facilities. The bill establishes two potential limits for school districts, depending on the availability of new school construction funding from the state and the particular needs of the individual school districts. CUSD, FUSD, and SUSD qualify for Level 1 developer fees, which are considered the base school-mitigation fee. To apply Level 1 fees, a district must justify its development fees for each land use and cannot request payment of development fees for school-facility construction exceeding the amount of the statutory fees expressed in Education Code Section 17620. If school districts conduct a school-facility needs assessment and qualify for participation in the State Funding Program by the State Allocation Board, among meeting other requirements, they can be eligible for Level 2.

Development in Clovis in accordance with the General Plan Update would require payments to CUSD, FUSD, and SUSD for the construction of new schools. Development impact fees charged by each school district are set within the limits of SB 50 and are shown in Table 5.14-13.

Table 5.14-13 Development Impact Fees for Districts Serving the City of Clovis

School District	Impact Fees	
	Residential	Commercial/Industrial
Clovis Unified School District	\$3.20 (additions/remodels) \$3.23 (new construction)	\$0.51
Fresno Unified School District	\$3.20/square foot	\$0.51/square foot
Sanger Unified School District	\$3.20	\$0.51

Source: LeBlanc 2013; Ulrich, 2013; Sepulveda, 2012.

5.14.3.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- SS-1 Result in a substantial adverse physical impact associated with the provisions 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 school services.

5.14.3.3 ENVIRONMENTAL IMPACTS

Impact 5.14-3: Development in accordance with the Clovis General Plan Update would generate new students who would impact the school enrollment capacities of area schools in CUSD, FUSD, and SUSD. [Threshold SS-1]

Impact Analysis

5. Environmental Analysis
PUBLIC SERVICES

2035 Scenario

Implementation of the General Plan Update would develop an estimated 25,200 units and 23,400 households in the 2035 scenario, resulting in up to 69,100 more people. The increase in residents would impact school enrollment capacities in all three districts: CUSD, FUSD, and SUSD.

School districts project the number of students that will be generated by new residential development by using district-specific rates. CUSD, FUSD, and SUSD have provided the generation rates used for development of single-family and multifamily residential units. The applicable projections of future student population are reflected in Table 5.14-14.

Table 5.14-14 2035 Scenario Project-Generated Students

Land Use	Increase in Units	Student Generation Rate	Generated Students	Current Enrollment + Generated	Existing Capacity	Remaining Capacity
Clovis Unified School District						
Single-Family Residential	9,947	E.S. = 0.3590	3,571	E.S. = 26,798 M.S. = 7,450 H.S. = 14,298	E.S. = 21,183 M.S. = 7,064 H.S. = 14,107	E.S. = (5,615) M.S. = (386) H.S. = (191)
		M.S. = 0.0775	771			
		H.S. = 0.1211	1,205			
Multifamily Residential	13,989	E.S. = 0.1093	1,529			
		M.S. = 0.0223	312			
		H.S. = 0.0344	482			
Fresno Unified School District						
Single-Family Residential	70	E.S. = 0.353	25	E.S. = 813 M.S. = 668 H.S. = 1,818	E.S. = 906 M.S. = 1,046 H.S. = 2,312	E.S. = 93 M.S. = 378 H.S. = 494
		M.S. = 0.097	8			
		H.S. = 0.222	16			
Multifamily Residential	357	E.S. = 0.204	73			
		M.S. = 0.036	13			
		H.S. = 0.049	18			
Sanger Unified School District						
Single-Family Residential	1,398	0.525	734	E.S. = 1,215 M.S. = 2,300 H.S. = 3,397	E.S. = 639 M.S. = 1,620 H.S. = 2,430	E.S. = (576) M.S. = (680) H.S. = (967)
			734			
			734			
Multifamily Residential	0	0.280	0			
			0			
			0			

The majority of the Plan Area is in CUSD's boundaries, where the bulk of the residential population would increase. Dwelling units would increase by 23,936 units in the CUSD service area. Thus, a large number of new students would be expected in the area. CUSD student projections are provided in Table 5.14-14.

A smaller portion, approximately 640 acres in the southwest corner of the City's boundaries, is within FUSD. This area is built out and contains a mix of medium- to high-density residential units, commercial strips, office space, and industrial space. A comparison between the existing and proposed land uses in this area shows that only commercial, office, and industrial land uses would change. The residential uses would not change; however, the proposed project slightly alters allowable residential densities and thus may result in additional student residents in the FUSD boundaries after project buildout. This means the student population within this area of the FUSD

5. Environmental Analysis

PUBLIC SERVICES

boundary would still increase as a result of the proposed project. FUSD projections are also included in Table 5.14-14.

Another portion of the Plan Area, approximately 450 acres within the 2035 scenario boundary and an additional 430 acres within the SOI, is within the SUSD boundary. This area would change from farmland to low-, medium-, and high-density residential and mixed-use land uses, indicating there would be an increase in student population in this area, which is also reflected in Table 5.14-14.

Table 5.14-14 shows that FUSD would not reach maximum student capacity in any grade level in the 2035 scenario. However, the generated students in the CUSD and SUSD school districts exceed the existing capacity at all grade levels by a substantial amount. In order to address this overcapacity, CUSD and SUSD would need to expand their facilities or build new schools to accommodate the increase in student population.

CUSD's 2014 Facilities Master Plan already takes into account the need for four elementary schools by 2023 in addition to an elementary school already in the design process, to be located near Temperance and Clinton Avenue in Fresno. CUSD is also anticipating shifting attendance area boundaries around North Clovis to better utilize available capacity in existing schools in the Clovis West and Clovis High areas. CUSD's Master Plan suggests altering attendance boundaries and school feeder patterns to better utilize the capacity of all CUSD high schools during the 10-year span of 2014 to 2024.

SUSD's Facilities Master Plan acknowledges that a middle or high school would need to be constructed by 2016 to relieve enrollment at Washington Academic Middle School and Sanger High School, which are the only middle and high schools in the district as of now.

Funding for these CUSD and SUSD future facilities acquisition and expansions would come from development impact fees (listed in Table 5.14-13) pursuant to SB 50, each respective jurisdiction's general funds, general obligation bonds, and state and federal funding programs. As stated above, development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation."

In addition, proposed policies within the General Plan Update highlight the importance of maintaining adequate school services to the City's student residents. Policy 3.7 in the Land Use Element supports residential development in the three urban centers that contribute to a neighborhood of parks, schools, streets, pedestrian pathways, and neighborhood amenities. Furthermore, Goal 3 of the Public Facilities and Services Element states that great schools and high quality educational and training facilities and programs define Clovis as the preeminent community for families and a skilled workforce. Policy 3.1 within Goal 3 advocates for the continued pursuit of academic excellence in schools serving the Clovis community; and Policy 3.2 encourages coordinating with school districts to locate future school facilities with maximum accessibility, walkability, and safety.

Thus, impacts on school services from the 2035 scenario of the General Plan Update would be less than significant.

5. Environmental Analysis
PUBLIC SERVICES

Full Buildout

The full buildout would allow estimated development of up to 65,100 housing units and 61,300 households, resulting in up to 179,300 additional residents. Using the same generation rates provided by the three school districts, Table 5.14-15 shows the projected increase in single-family and multifamily housing units and the anticipated future student population in the full buildout scenario.

Table 5.14-15 Full Buildout Project-Generated Students

Land Use	Increase in Units	Student Generation Rate	Generated Students	Current Enrollment + Generated	Existing Capacity	Remaining Capacity
Clovis Unified School District						
Single-Family Residential	28,894	E.S. = 0.3590	10,373	E.S. = 35,683 M.S. = 9,344 H.S. = 17,247	E.S. = 21,183 M.S. = 7,064 H.S. = 14,107	E.S. = (14,500) M.S. = (2,280) H.S. = (3,140)
		M.S. = 0.0775	2,240			
		H.S. = 0.1211	3,499			
Multifamily Residential	33,040	E.S. = 0.1093	3,612			
		M.S. = 0.0223	737			
		H.S. = 0.0344	1,137			
Fresno Unified School District						
Single-Family Residential	91	E.S. = 0.353	33	E.S. = 859 M.S. = 676 H.S. = 1,832	E.S. = 906 M.S. = 1,046 H.S. = 2,312	E.S. = 47 M.S. = 370 H.S. = 480
		M.S. = 0.097	9			
		H.S. = 0.222	21			
Multifamily Residential	544	E.S. = 0.204	111			
		M.S. = 0.036	20			
		H.S. = 0.049	27			
Sanger Unified School District						
Single-Family Residential	2,141	0.525	1,124	E.S. = 1,887 M.S. = 2,972 H.S. = 4,069	E.S. = 639 M.S. = 1,620 H.S. = 2,430	E.S. = (1,248) M.S. = (1,352) H.S. = (1,639)
			1,124			
			1,124			
Multifamily Residential	1,007	0.280	282			
			282			
			282			

According to Table 5.14-15, FUSD would not reach maximum student capacity in any grade level at full buildout and would still have a comfortable buffer before reaching the existing capacities for elementary schools, middle schools, and high schools. CUSD and SUSD, however, would substantially exceed the existing capacity for all grade levels from the increase in student population generated at full buildout of the General Plan Update. Therefore, CUSD and SUSD would need to expand their school facilities or build new schools to accommodate the increase in student population.

The General Plan Update is meant to guide future development in the City but it is not a development project. New dwelling units in the City may generate 10,225 and 26,037 additional students in the 2035 scenario and full buildout, respectively, but the number of students that would be generated within the enrollment area of each

5. Environmental Analysis

PUBLIC SERVICES

school cannot be determined specifically at this point. Therefore, it would be speculative to analyze the impacts of future student generation on specific schools.

Although the increased demand for school facilities would result in substantial impact, new developers would be required to pay impact fees to comply with SB 50. As stated above, compliance with SB 50 is deemed to be “full and complete school facilities mitigation” per Section 65996 of the California Government Code. Thus, impacts would be reduced to less than significant levels. In addition, future bond measures, capital investments, and federal, state, and local funding would help to further reduce impacts.

Implementation of policies and implementation measures included in the proposed General Plan Update highlight the importance of academic success and maintenance of school facilities for Clovis’ existing and future student residents. The policies stress the importance of improving school services as the City’s population continues to grow in accordance with the proposed project.

5.14.3.4 RELEVANT GENERAL PLAN POLICIES AND DEVELOPMENT CODE SECTIONS

The following are relevant policies of the proposed Clovis General Plan and Development Code Update that would reduce potential impacts on school services from future development in the Plan Area.

General Plan

Land Use Element

Goal 3: Orderly and sustainable outward growth into three Urban Centers with neighborhoods that provide a balanced mix of land uses and development types that support a community lifestyle and small town character.

- **Policy 3.7 Urban Village Neighborhood Concept** - Residential developments in Urban Centers must contribute to and become a part of a neighborhood by incorporating a central park feature, a school complex, a hierarchy of streets, pedestrian pathways, or other neighborhood amenities. Higher density residential should be located next to Mixed Use Village designated lands. The City may also require the application of the urban village neighborhood concept in areas outside of an Urban Center.

Public Facilities and Services Element

Goal 3: Great schools and high quality educational and training facilities and programs that define Clovis as the preeminent community for families and a skilled workforce.

- **Policy 3.1 Academic excellence** - Advocate for the continued pursuit of academic excellence in schools serving the Clovis community.
- **Policy 3.2 School location** - Coordinate with the school districts to locate primary school facilities to maximize access, walkability, and safety while minimizing impacts to surrounding neighborhoods. Continue to foster the campus approach when siting secondary schools.

5. Environmental Analysis PUBLIC SERVICES

5.14.3.5 EXISTING REGULATIONS

- California State Assembly Bill 2926: School Facilities Act of 1986
- California Senate Bill 50

5.14.3.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, the following impact would be less than significant for the 2035 Scenario and Full Buildout: 5.14-3.

5.14.3.7 MITIGATION MEASURES

No mitigation measures are required for the 2035 Scenario and Full Buildout.

5.14.3.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant for the 2035 Scenario and Full Buildout.

5.14.4 Library Services

5.14.4.1 ENVIRONMENTAL SETTING

Regulatory Background

County of Fresno Municipal Code

The County of Fresno Municipal Code identifies land use categories, development standards, and other general provisions that ensure consistency between the County's General Plan and proposed development projects. The following provisions from the county's municipal code focus on library services impacts associated with new development projects and are relevant to the proposed project:

- **Title 4 (Revenue and Finances), Chapter 4.20 (Fresno County Public Library Transactions and Use Tax):** Imposes a one-eighth of 1 percent retail transactions and use tax that provides funding for public library construction, acquisition, programs, and operations within Fresno County.
- **Title 17 (Divisions of Land), Chapter 17.90 (Public Facilities Impact Fees and Schedule of Fees):** Establishes a public facilities impact fee to mitigate adverse impacts caused by new development within the cities and in the unincorporated areas of Fresno County upon the County's public facilities, including County-wide public protection, general government, library, health and human services, sheriff patrol and investigation, County parks, and a 2.5 percent administrative charge.

City of Clovis Municipal Code

Similar to the County of Fresno Municipal Code, the City of Clovis Municipal Code also identifies land use categories, development standards, and other general provisions to guide the City's development. The following provision from the City's municipal code focuses on library services impacts:

5. Environmental Analysis

PUBLIC SERVICES

- **Title 7 (Public Works), Chapter 7.8 (Library Facilities Development Impact Fee):** Establishes a library facilities development impact fee (“library fee”) for the City, which shall be used to mitigate adverse impacts to public library facilities and equipment attributed to new development.

Existing Conditions

Library service in Clovis is provided by the Fresno County Public Library (FCPL), which has 37 regional libraries, including a bookmobile that travels throughout the county. The Clovis Regional Library, at 1155 Fifth Street, is the only regional branch in the Plan Area, shown in Figure 5.14-6, *Existing Schools and Library Locations*.

The FCPL provides collections and services through its central library and 34 branches throughout Fresno County. FCPL is also part of the San Joaquin Valley Library System (SJVLS), a cooperative of 10 public library jurisdictions in Fresno, Kern, Kings, Madera, Mariposa, Merced, and Tulare counties. Members of libraries within the SJVLS are able to request interlibrary loans for most materials and access online databases and digital materials collections at participating libraries. Overall, FCPL serves a population of 919,379 people and staffs 292 employees. There are approximately 1,132,500 books, 1,950 current periodical subscriptions, 1,241,334 government publications, 76,566 video materials, and 111,495 audio materials in the entire Fresno Library collection.

The Clovis Regional Library building is 8,627 square feet and houses a collection of 62,240 items, including books, periodicals, DVDs, CDs, audiobooks, Chromebooks, and gaming supplies. The library provides free Wi-Fi via its nine public computers and allows access to the Internet and other computer programs. Programs for all ages are offered to the Clovis community free of charge, including preschool and family story times; summer reading programs for children, teens, and adults; book clubs and discussions; author events; after-school programs for teens and school-aged children; resume assistance by appointment; and music programs and performances. Clovis Regional Library users are also able to enjoy resources offered by other regional, branch, and neighborhood libraries of the FCPL through interlibrary loans, including 981,536 books, 6,647 e-books, 193,243 audiovisual materials, other programs, and online resources.

With recent technological advances, electronic-collection items are becoming the favored resource type in libraries, compared to the traditional books. As more and more users rely on electronic resources, it has become increasingly difficult to estimate the type and amount of library resources required to adequately serve the local community.

FCPL has indicated that, with the existing population in the City of Clovis service area, where more than 480,000 items are circulated annually, the current Clovis Regional Library is currently not large enough to adequately serve the system’s service population and is substantially smaller than other Fresno County regional libraries. FCPL has existing plans, dependent on available funding, to develop a new regional library in Clovis to be equipped with the latest technologies, increased capacity, mini conference site facilities, and a children’s library. It is also planned as a delivery hub for the entire Fresno County Library System. FCPL also has plans in the near future to install library service kiosks in the Clovis area, with one installation in the next six months at the Sierra Vista Mall, the first library kiosk in the county.

5. Environmental Analysis PUBLIC SERVICES

Funding

Funding for the Fresno County Public Library network comes primarily from the Fresno County Public Library Transactions and Use Tax and public facilities impact fees per Chapters 4.20 and 17.90 of the county's municipal code, respectively. The transactions and use tax imposes a one-eighth of 1 percent retail transactions and use tax on all retailers. The public facilities impact fee associated with library services is currently \$485 per single-family dwelling unit and \$356 per multifamily dwelling unit, and due and payable as a condition prior to issuance of a building permit. These funds would be used to finance costs for public library construction, acquisition, programs, and operations within Fresno County.

As a supplement to the county's impact fees, Chapter 7.8 of the City of Clovis's Municipal Code establishes a library facilities development impact fee, which is collected from all new residential developments in the City to ensure that sufficient funding for library facilities is available to serve residential growth in the City and its SOI. Impact fees are \$604 per single-family dwelling unit and \$494 per multifamily or assisted living/group home; they are due and payable as a condition prior to approval of a final map, parcel map, or building permit. Library fundraising and private contributions also make up a proportion of available library funds. The funds generated are used to mitigate adverse impacts to public library facilities and equipment attributed to new development. Thus, the library fees would be used by the City to pay a portion of the costs of designated library facilities and equipment to ensure that developers pay their equal share of the costs of such library facilities required to serve the City's growing population.

Measure B

In 1998, Fresno County voters approved ballot Measure B, which allowed the county library system to collect a 1/8 percent sales tax to improve library services. It was renewed by voters in 2004, and this sales tax has resulted in \$142 million dollars over the course of 12 years as of June 2011. Measure B currently provides more than 54 percent of the annual county library budget. FCPL's main objectives with the funding received from Measure B are to increase open hours at the library branches; replace worn-out materials and add new books; expand programs and services to children, young adults, and adults; reestablish locally funded literacy services; maintain local branch equipment and fixtures; restore library facilities maintenance; and construct new libraries and remodel existing facilities. Measure B was renewed by voters again in 2012 and would continue supporting FCPL's library programs and services until 2029.

5.14.4.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- LS-1 Result in a substantial adverse physical impact associated with the provisions 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 or other performance objectives for library services.

5. Environmental Analysis

PUBLIC SERVICES

5.14.4.3 ENVIRONMENTAL IMPACTS

Impact 5.14-4: Development in accordance with the Clovis General Plan Update would generate additional population, increasing the service demands for the Clovis Regional Library. [Threshold LS-1]

Impact Analysis:

2035 Scenario

The General Plan Update 2035 scenario estimates development of up to 25,200 additional housing units and 23,400 new households, resulting in up to 69,100 new residents. This increase in population would lead to greater demands for library services and generate a need for additional staff, library items, computers, and facility space.

FCPL states that in order to serve a population of 184,100 people, a new regional library would need to be built in north Clovis (in addition to the regional library already in planning) that has 23,000 square feet of library building space, approximately 3.8 acres of property for the library building and parking, and a collection of over 200,000 items. However, construction of this new regional library would depend heavily on funding availability. In addition to the regional library, FCPL is also planning to relocate the existing Clovis Regional Library to another downtown site and designate it as a branch library. Furthermore, FCPL is planning to install one to two library service kiosks in the City and/or SOI for easier accessibility to library services throughout the region.

Conversely, there has been a growing demand for electronic resources rather than hard-copy resources. Therefore, former service standards are no longer appropriate when assessing library demands of growing populations. This means that although the 2035 scenario would result in up to 69,100 additional residents, it does not necessarily mean that there would be a direct demand for more library collection items or facility space. The residents would also still be able to continue using interlibrary collection items within the FCPL system, which offers a substantially larger collection of electronic and hard-copy resources. In addition, the General Plan Update policies would still address library facilities and help to ensure that adequate library facilities and resources are continually available to the City's growing population. For example, Policy 4.1 through 4.3 under the General Plan Update's Public Facilities and Services Element encourage establishments of cultural facilities, libraries, and community centers, and coordination with local educational institutions to provide learning opportunities for residents of all ages.

Future Fresno County public library construction, acquisition, programs, and operations would be funded by the Fresno County Public Library Transactions and Use Tax and development impact fees per Chapters 4.20 and 17.90 of the County's municipal code. Furthermore, library facilities development impact fees, pursuant to Chapter 7.8 of the City of Clovis Municipal Code, would be charged on all new developments and generate revenue that would be used for library facilities expansions, improvements, and maintenance in the City. The City and County funds collected would ensure library resources remain adequate to serve the larger future population. Funds from Measure B would also continue supporting the Fresno County library system through 2029. Additional funding sources include community fundraising and private contributions. Overall, impacts to library services from buildout of the General Plan Update would be less than significant.

5. Environmental Analysis PUBLIC SERVICES

Full Buildout

The full buildout would result in 65,100 additional housing units and 61,300 new households, resulting in up to 179,300 new residents. This would lead to a definite increase in demand of library services and resources.

To adequately serve a new population of 294,300 people, FCPL indicates that in addition to completing the two regional libraries as described above, another library building would need to be built in the Millerton New Town, northeast of the City at the southern base of Millerton Lake where FCPL currently owns land designated for a future library building. If a library was built there, it would better serve the population in the SOI and non-SOI Plan Area, which are farther from the City's downtown area. If the county's plans to construct the Millerton New Town library facility and two regional libraries, relocate the existing Clovis Regional Library to downtown Clovis as a branch library, and install multiple library kiosks in the Clovis area, FCPL would meet the needs for projected demands resulting from full buildout of the proposed General Plan Update.

Nevertheless, the number and location of libraries required to adequately serve the projected full buildout population are dependent on where and when the development would occur geographically, especially because of the vast size of the proposed Plan Area. Because the location and extent of development cannot be determined specifically at this point, it would be speculative to analyze the impacts of future library service demands on the City. Furthermore, as previously stated, library facilities and resource demands are now more and more difficult to accurately calculate with the introduction and increasing use of electronic resources over hard-copy collection items. Thus, full buildout may not directly lead to demands for increased library facility space or hard-copy collection items. Library demands may instead be met through increased electronic resources and an efficient FCPL website and interlibrary loan program.

As stated above, funding would continue to be provided through library facilities development impact fees per Chapter 7.8 of the City's municipal code; transactions and use taxes and public facilities fees per Chapters 4.20 and 17.90 of the county's municipal code; community fundraising; private contributions; and, potentially, a renewed Fresno County libraries state tax under Measure B that expires at the end of 2029. Policies in the General Plan Update would also address provisions for adequate library services and facilities. Overall, impacts to library services would remain less than significant.

5.14.4.4 RELEVANT GENERAL PLAN POLICIES AND DEVELOPMENT CODE SECTIONS

The following are relevant policies of the proposed Clovis General Plan and Development Code Update that would reduce potential impacts on library services from future development in the Plan Area.

General Plan

Public Facilities and Services Element

Goal 4: Community facilities and programs that connect members of all ages and abilities to a broad range of cultural, informational, and recreational resources.

- **Policy 4.1 Cultural facilities** - Encourage the establishment of a broad range of facilities and events that expose Clovis residents to a variety of cultures, the arts, history, and technology.

5. Environmental Analysis

PUBLIC SERVICES

- **Policy 4.2 Libraries and community centers** - Design and program libraries and community centers as focal points for community engagement and information for residents of all ages and abilities.
- **Policy 4.3 Lifelong learning** - Enhance and expand Clovis' library facilities to meet the evolving educational and lifelong learning needs of the community. Coordinate with local educational institutions to offer courses and learning opportunities outside the classroom.

5.14.4.5 EXISTING REGULATIONS

- County of Fresno Municipal Code
 - Title 4, Chapter 4.20, Fresno County Public Library Transactions and Use Tax
 - Title 17, Chapter 17.90, Public Facilities Impact Fees and Schedule of Fees
- City of Clovis Municipal Code Title 7, Chapter 7.8, Library Facilities Development Impact Fee
- Fresno County Libraries State Tax, Measure B

5.14.4.6 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, the following impact would be less than significant for the 2035 Scenario and Full Buildout: 5.14-4.

5.14.4.7 MITIGATION MEASURES

No mitigation measures are required for both the 2035 Scenario and Full Buildout.

5.14.4.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant for the 2035 Scenario and Full Buildout.

5.14.5 References

Basgall, Matthew (captain). 2013, August 7. Response to Service Questionnaire. Clovis Police Department.

Bump, Chris (battalion chief). 2013, August 9. Response to Service Questionnaire. Fresno County Fire Protection District.

Clovis, City of. 2013a, June 10. Finance Department. Report to the City Council: Receive and File – Findings & Recommendations from Community Facilities District Citizens Committee.

<https://www.ci.clovis.ca.us/Portals/0/Documents/CityCouncil/Agendas/2013/20130610/CC-D-3.pdf>.

———. 2013b, May 20. City of Clovis 2013-2014 Annual Budget.

<http://www.ci.clovis.ca.us/Portals/0/Documents/Finance/2013-14AnnualBudget.pdf>.

5. Environmental Analysis PUBLIC SERVICES

Despain, Michael (fire chief). 2013, November 18. City of Clovis Report to the City Council: Consider Approval—Authorize the City Manager and Fire Chief to sign an Automatic Aid Agreement between the City of Clovis Fire Department and the Fresno County Fire Protection District for provision of defined emergency services. Clovis Fire Department.

———. 2014, May 15. E-mail correspondence. Clovis Fire Department.

Fitzgerald, Chad (life safety enforcement manager). 2014, March 19. E-mail correspondence. Clovis Fire Department.

Fresno County Public Library. 2012. Fresno County Public Library Annual Report 2012.

Horton, Jennifer (captain). 2013, April 17. Response to Service Questionnaire. Fresno County Sheriff's Department.

Kraft, Lee (fire chief). 2012 November 16. Response to Service Questionnaire. Clovis Fire Department.

LeBlanc, Lisa (executive officer, facilities management and planning). 2012, November 26. Response to Service Questionnaire. Fresno Unified School District.

Michaels, Ryan (public information/media relations fire captain). 2013, September 26. Phone correspondence. Fresno County Fire Protection District.

Sepulveda, Richard (chief operations officer). 2013, April 9. Response to Service Questionnaire. Sanger Unified School District.

Ulrich, Don (assistant superintendent, facility services). 2013, May 7. Response to Service Questionnaire. Clovis Unified School District.

Worman-Landano, Kelley (associate county librarian). 2012, November 27. Response to Service Questionnaire. Fresno County Public Library.

5. Environmental Analysis

PUBLIC SERVICES

This page intentionally left blank.