

## K. PUBLIC SERVICES

This section evaluates impacts associated with implementation of the Station Area Plan on public services, including fire, police, and school services. The setting section describes the existing conditions for each service provider and also includes a description of applicable regulatory and/or policy documents. The setting section is based on information provided in the Larkspur SMART Station Area Plan,<sup>1</sup> Existing Conditions Report,<sup>2</sup> and related policy documents, and by consultation with public service providers.

The impacts and mitigation measures section discusses potential impacts to public services that could result from implementation of the Station Area Plan. The analysis of potential environmental impacts on public services that could result from implementation of the Station Area Plan is primarily based on the need for new facilities and whether construction of these facilities could result in environmental impacts.

### 1. Setting

This section describes existing conditions related to Larkspur's fire and emergency medical services, police services, and public schools.

**a. Fire and Emergency Medical Services.** This section describes fire protection and emergency medical services in the City of Larkspur. It includes a brief discussion of City of Larkspur Fire Department (LFD) staffing levels, facilities, programs, response times, and reported emergencies. Information from this section is based primarily on communication with LFD staff.

**(1) Existing Staff and Facilities.** The LFD provides fire protection and emergency medical services within the City of Larkspur and the Plan area. The LFD had 17 full-time staff for the 2011-12 fiscal year, which were augmented by a part-time contract staffer and approximately 15 volunteers.<sup>3,4</sup> The LFD operates in three shifts, with two Captains and three firefighters on duty during each shift. The Fire Chief handles administrative functions.<sup>5</sup>

The LFD staff is divided into three divisions: the Administrative Services Division; the Fire Prevention Division; and the Fire Protection and Emergency Medical Services Division. While not part of the LFD, the Building Code Enforcement Division is overseen by the LFD Fire Chief. The Administrative Services Division is staffed by a single Fire Chief.<sup>6</sup> The Fire Prevention Division, which focuses on avoiding or reducing the impact of fires (e.g., plan reviews and inspections), is

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<sup>1</sup> Larkspur, City of, 2014. *Larkspur SMART Station Area Plan, Public Review Draft*. February.

<sup>2</sup> BMS Design Group, 2013. *Larkspur SMART Station Area Plan Existing Conditions Report*. July 31.

<sup>3</sup> Volunteers are not involved in fire suppression or emergency response.

<sup>4</sup> Sinnott, Bob, 2012. Fire Chief, Larkspur Fire Department. Personal Communication with LSA Associates, Inc. May 22.

<sup>5</sup> Larkspur, City of, 2011. *Capabilities of Your Fire Department*. Website: [www.ci.larkspur.ca.us/DocumentView.aspx?DID=190](http://www.ci.larkspur.ca.us/DocumentView.aspx?DID=190) (accessed May 21, 2012).

<sup>6</sup> Note that the Fire Chief position is split between the Administrative Services Division (50 percent), the Fire Prevention Division (10 percent), the Emergency Medical Services (30 percent) and the Building Code Enforcement Division (10 percent).

staffed by one part-time Fire Prevention Inspector. The Fire Protection and Emergency Medical Services Division is tasked with the delivery of fire protection and pre-hospital emergency medical care services. It is staffed with six captains and ten firefighters/engineers. The Building Code Enforcement Division employs one part-time Contract Building Inspector.<sup>7</sup>

The LFD operates out of two fire stations. The main fire station – Fire Station 15 – is located at 420 Magnolia Avenue. Originally built in 1939, Fire Station 15 is staffed by three employees per shift: a chief officer, a captain and one engineer/firefighter. One fire engine and one water tender (i.e., water tanker) is housed at Fire Station 15.<sup>8</sup> Fire Station 15 has been identified as needing extensive rehabilitation, including structural repairs and redesign to bring the station up to seismic safety requirements and to better accommodate its use as a fire station; however, no schedule or funding has been identified for this rehabilitation.

Fire Station 16 is located at 15 Barry Way and is staffed by a captain and two engineer/firefighters. Two fire engines (one on-duty and one reserve) and one wildland fire engine are housed at Fire Station 16.<sup>9</sup> Fire Station 16 was demolished and replaced on the same site with a new station in 1990. This new station is designed in two modular sections, one for an engine room, and the other for an office/living unit. Fire Station 16, which is approximately 3 miles (driving distance) from the Plan area, is the closest station, and would be the first responder in an emergency.

**(2) Service Calls and Department Goals.** The LFD receives approximately 1,500 calls each year, 70 percent of which are related to medical rescue. Cardiac, respiratory and neurological emergencies, falls and vehicle collisions are the most common call types.<sup>10</sup> The target response time for fire protection services is 5 to 7 minutes or less, 90 percent of the time.<sup>11</sup>

**(3) Fire Prevention Programs.** The LFD administers fire prevention activities designed to reduce fire loss, preserve life and control other hazardous conditions. Additionally, the LFD conducts plan reviews and inspections to ensure that new construction or the remodeling of existing building conforms to applicable codes and safety ordinances.<sup>12</sup> Each of these program components are described in further detail below:

- **Community Emergency Response Training.** The Marin County fire departments, including the LFD, have adopted a citizen training program: Community Emergency Response Training (CERT). CERT is designed to train citizens to care for themselves and neighbors in the event of a disaster, such as an earthquake or wildland fire.

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<sup>7</sup> Larkspur, City of, 2011. *City of Larkspur Adopted Budget FY2011-2012*. June.

<sup>8</sup> Larkspur, City of, 2012. Larkspur Fire Department, Fire Stations & Apparatus, website: [www.ci.larkspur.ca.us/index.aspx?nid=240](http://www.ci.larkspur.ca.us/index.aspx?nid=240) (accessed May 18).

<sup>9</sup> Ibid.

<sup>10</sup> Larkspur, City of, 2011. PowerPoint Presentation: Larkspur Fire Department. Website: [ca-larkspur.civicplus.com/DocumentCenter/Home/View/1080](http://ca-larkspur.civicplus.com/DocumentCenter/Home/View/1080) (accessed May 21, 2012).

<sup>11</sup> Sinnott, 2012, op. cit.

<sup>12</sup> Larkspur, City of, 2012. Larkspur Fire Department, Prevention, Education & Preparedness. Website: [www.ci.larkspur.ca.us/index.aspx?NID=227](http://www.ci.larkspur.ca.us/index.aspx?NID=227) (accessed May 21).

- **Cardiopulmonary Resuscitation Training.** The LFD offers Cardiopulmonary Resuscitation (CPR) training. This approximately three-hour class gives students the skills needed to handle basic emergencies as well as CPR and choke-saving skills, and students are certified through the American Heart Association.
- **Neighborhood Emergency Response Training.** Similar to CERT, the LFD has used the Neighborhood Emergency Response Team (NERT) program to train citizens to be better prepared and provide for themselves, their families, and their neighbors in the event of an emergency.
- **Vegetation Management.** The LFD addresses wildland fire through their Master Fire Ordinance, which designates high-hazard fire zone areas, details specific vegetation problems, provides an abatement policy for the enforcement of fire hazards, addresses the need for chimney spark arrestors, and provides guidelines for vegetation management on properties within the City that are owned by public agencies and utilities.

(4) **Emergency Medical Services.** The Ross Valley Paramedic Authority (RVPA) is responsible for EMS/paramedic emergency ambulance services for the communities of Corte Madera, Larkspur, Kentfield, Ross, San Anselmo, Sleepy Hollow, Fairfax, and County Service Area 27. While firefighters at the LFD are trained as paramedics and EMTs, and thus can provide medical care in an emergency, the LFD does not maintain any ambulances and thus relies on the RVPA for medical transport. The RVPA contracts with the Marin County Fire Department (MCFD).<sup>13</sup> MCFD administers and staffs Medical Station 18 (Medic 18) at the Ross Valley Fire Station on 33 Sir Francis Drake Boulevard, Ross, CA.<sup>14</sup> Medical Station 18 is approximately 3.1 miles from the Plan area (driving distance). One ambulance is staffed by two MCFD paramedics at all times.<sup>15</sup>

b. **Police Services.** This section describes police services within the Plan area. It includes a brief discussion of Central Marin Police Authority (CMPA) staffing levels, facilities, programs, response times, and the most common types of emergencies reported in Larkspur. Information from this section is primarily based on communication with CMPA staff.

(1) **Existing Staff.** The CMPA provides police services for the Town of Corte Madera, the City of Larkspur, the Town of San Anselmo and portions of Greenbrae. Formed in January 2013, the CMPA was formed under a joint powers agreement between Corte Madera, Larkspur and San Anselmo. Prior to January 2013, Larkspur was served by the Twin Cities Police Authority (TCPA), a joint powers agreement between Corte Madera and Larkspur. Along with automatic response agreements between the surrounding jurisdictions of Tiburon, Belvedere, Larkspur, Mill Valley, and Marin County, the CMPA has a State Mutual Aid Agreement with the County Sheriff to provide services in emergency situations. The CMPA has 58 employees with 45 sworn full-time officers.<sup>16</sup>

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<sup>13</sup> Marin, County of, 2012. Emergency Medical Services. Website: [www.co.marin.ca.us/depts/fr/main/fire/services.cfm](http://www.co.marin.ca.us/depts/fr/main/fire/services.cfm) (accessed May 21). April 25.

<sup>14</sup> Marin County Fire Department, 2011. Fire Stations. Website: [www.xmrfire.org/mrn/about/stations.aspx](http://www.xmrfire.org/mrn/about/stations.aspx) (accessed May 21, 2012).

<sup>15</sup> Sinnott, Bob, 2012. Executive Director, Ross Valley Medical Authority. Personal Communication with LSA Associates, Inc. May 22.

<sup>16</sup> Central Marin Police Authority, 2013. *Central Marin Police Authority*. Website: [www.ci.larkspur.ca.us/index.aspx?NID=488](http://www.ci.larkspur.ca.us/index.aspx?NID=488) (accessed December 3).

The CMPA is divided into four divisions: Administration, Field Operations, Communications, and Support Services. Administration handles general department management duties and includes the police chief, patrol captain, police lieutenant and the police chief's secretary. Field Operations provides law enforcement services, responds to calls for service, and initiates most investigations. The Traffic Division and Directed Patrol Unit are also included in Field Operations.<sup>17</sup> The Communications Division provides technical and clerical support for all police activities including processing calls for service, dispatching communications, records management, and front counter service.<sup>18</sup> Finally, Support Services investigates felony and misdemeanor crimes, identifies and apprehends offenders, recovers stolen property and contraband, and prepares cases for criminal prosecution.<sup>19</sup> The CMPA calculates the need for new officers based on the number of officers per capita. The County average, which serves as a benchmark, is 2.03 officers per 1,000 people. CMPA is currently at 1.3 officers per 1,000 people.<sup>20</sup>

**(2) Facilities and Beat Patrol.** CMPA operates two police stations: one is located in Larkspur at 250 Doherty Drive, (approximately 1 mile from the Plan area) and the second is in San Anselmo at 525 San Anselmo Avenue. A sub-station is located at the Corte Madera Fire Station (Station 13) on Paradise Drive in Corte Madera. The CMPA has a fleet of 15 marked and 9 unmarked police vehicles.<sup>21</sup>

The CMPA's jurisdiction is split into five beats: the eastern portion of Corte Madera; a central area encompassing most of Larkspur and the western portion of Corte Madera; the area from North Magnolia Avenue to north of Sir Francis Drake Boulevard; and two in San Anselmo, each encompassing about half of the city. The Plan area falls within the central area beat. When fully staffed, every shift has one Sergeant (in-charge of shift) and one corporal (general patrol – not assigned a beat). Each beat has one officer and one additional general patrol cover officer assigned to the shift. Dayshifts also have one traffic officer assigned to every city/town, with an additional traffic sergeant who oversees supervision of the traffic officers. Two detectives are assigned to swing shifts to assist patrol as needed.<sup>22</sup>

**(3) Response Times.** While the CMPA has not formally adopted response times, the 2013 response times for priority 1 calls<sup>23</sup> for service was approximately 3 minutes and 30 seconds.<sup>24</sup>

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<sup>17</sup> Central Marin Police Authority, 2013. *Field Operations*. Website: [www.ci.larkspur.ca.us/index.aspx?nid=349](http://www.ci.larkspur.ca.us/index.aspx?nid=349) (accessed December 3).

<sup>18</sup> Central Marin Police Authority, 2013. *Communications*. Website: [www.ci.larkspur.ca.us/index.aspx?nid=352](http://www.ci.larkspur.ca.us/index.aspx?nid=352) (accessed December 3).

<sup>19</sup> Central Marin Police Authority, 2013. *Support Services*. Website: [www.ci.larkspur.ca.us/index.aspx?nid=353](http://www.ci.larkspur.ca.us/index.aspx?nid=353) (accessed December 3).

<sup>20</sup> Cusimano, Todd, 2013. Police Chief, Central Marin Police Authority. Written communication with LSA Associates, Inc. December 10.

<sup>21</sup> Ibid.

<sup>22</sup> Ibid.

<sup>23</sup> Priority 1 calls are defined by in-progress crimes or emergency calls for service.

<sup>24</sup> Cusimano, Todd, 2013. Police Chief, Central Marin Police Authority. Written communication with LSA Associates, Inc. December 19.

(4) **Crime Statistics and Issues.** For the purposes of crime statistics, the CMPA defines Part I crimes to include: homicide, rape, robbery, assaults, burglary, theft, auto theft and arson. Part II crimes include all other crime categories. As shown in Table IV.K-1, there were 762 Part I crimes within CMPA’s jurisdiction in 2011; 280 in the City of Corte Madera, 265 in the City of Larkspur, and 217 in San Anselmo. Part I crimes were down 24 percent from 2010 with drops in robberies, residential and commercial burglaries, and assaults.<sup>25</sup>

**Table IV.K-1: Part I Crimes (2009 – 2011)**

Classification	2009			2010			2011		
	Corte Madera	Larkspur	San Anselmo	Corte Madera	Larkspur	San Anselmo	Corte Madera	Larkspur	San Anselmo
Criminal Homicide	0	0	0	0	0	0	0	0	0
Forcible Rape	1	1	4	0	1	0	2	2	1
Robbery	4	4	2	7	2	1	7	5	2
Assault	38	47	21	29	40	29	20	32	36
Burglary/Residential	20	45	43	23	70	37	28	34	23
Burglary/Commercial	57	39	11	65	32	28	49	35	16
Thefts	220	176	146	223	191	149	163	138	129
Motor Vehicle Theft	27	51	9	23	41	10	10	19	9
Arson	1	4	1	2	0	1	1	0	1
<b>Total</b>	<b>368</b>	<b>367</b>	<b>237</b>	<b>372</b>	<b>377</b>	<b>255</b>	<b>280</b>	<b>265</b>	<b>217</b>

Source: Cusimano, Todd, 2013. Police Captain, Central Marin Police Authority. Written communication with LSA Associates. December 11.

(5) **Public Safety Programs.** The CMPA promotes a number of public safety programs, as described below:

- **Alzheimer’s Program.** The CMPA developed a community-based program for residents with Alzheimer’s. CMPA will, free of charge, come to a person's home and provide a data collection sheet and take a digital photograph of the person. The data sheet will be filled out by a family member and returned to the police. This ensures that the police department has the proper information should a family member go missing.
- **Twin Cities Police Explorers.** The Police Explorers is a youth program for boys and girls between the ages of 14 and 21. Participants get first-hand experience with law enforcement, including training in arrest techniques, report writing, scenarios to improve communication skills, and interviewing techniques.<sup>26</sup>
- **Neighborhood Watch Program.** CMPA supports the National Neighborhood Watch Institute and assists members of the community in establishing local Neighborhood Watch programs. Training materials, window warning decals, work sheets and quality street signs are available.

<sup>25</sup> Central Marin Police Authority, 2013. *Crime Statistics*. Website: [www.ci.larkspur.ca.us/index.aspx?nid=479](http://www.ci.larkspur.ca.us/index.aspx?nid=479) (accessed December 12, 2013).

<sup>26</sup> Cusimano, 2013, op.cit.

**c. Schools.** This section describes school services in the Plan area; information in this section is based primarily on communication with the school districts and related district reports.

Financial and administrative support for education services is largely provided by the school districts that manage schools attended by City of Larkspur residents. The City does not have jurisdiction over school programs or facilities. School districts receive the bulk of their funding from the California State Department of Education, and they have the authority to administer programs and develop school site properties without City oversight.

The following section describes school services within the Plan area, which are provided by four school districts: the Larkspur-Corte Madera School District (grades K-8); Kentfield School District (grades K-8); San Rafael City Schools District (which includes San Rafael Elementary School District [grades K-8] and the San Rafael City High School District [grades 9-12]);<sup>27</sup> and the Tamalpais Union High School District (9-12). Figure IV.K-1 shows the boundaries of each district in relation to the Plan area, Table IV.K-2 shows schools that serve the Plan area, and Table IV.K-3 shows 2012-2013 enrollment and capacity at each school.

**Table IV.K-2: Public Schools Serving the Plan Area**

Larkspur-Corte Madera School District (Grades K-5)	Kentfield School District (Grades K-8)	San Rafael City Schools District		Tamalpais Union High School District (Grades 9-12)
		San Rafael City Elementary District (Grades K-8)	San Rafael City High School District (Grades 9-12)	
Neil Cummins Elementary Henry C. Hall Middle School	Anthony G. Bacich Elementary Adaline E. Kent Middle	Bahia Vista Elementary San Pedro Elementary James B. Davidson Middle	San Rafael High Terra Linda High	Redwood High San Andreas High <sup>a</sup> Tamiscal High <sup>b</sup>

<sup>a</sup> San Andreas High is a continuation school.

<sup>b</sup> Tamiscal High is an alternative high school.

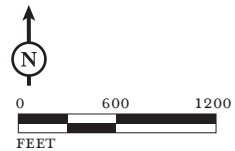
Source: BMS Design Group, 2012. Larkspur SMART Station Area Plan: Schools Summary. San Rafael City Schools District, 2013.

<sup>27</sup> As described in detail in this section, the San Rafael Schools District includes both the San Rafael Elementary School District and the San Rafael City High School District. Because the Elementary and High School District have different boundaries, they are separated.



FIGURE IV.K-1

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- Study Area Boundary
- SMART Station Location
- Larkspur Ferry Terminal
- High School District Boundary
- Kentfield School District
- San Rafael Elementary School District
- Larkspur-Corte Madera School District

*City of Larkspur SMART Station Area Plan EIR*  
 School Districts Serving the Plan Area

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**Table IV.K-3: School Location, Capacity and Enrollment, 2012-2013**

School/District	Location	2012-2013 Enrollment (Students)	Capacity (Students)	Excess Capacity <sup>a</sup> (Students)
<b>Larkspur-Corte Madera School District</b>				
Neil Cummins Elementary School	58 Mohawk Avenue Corte Madera, CA 94925	800	845	45
Henry C. Hall Middle School	200 Doherty Drive Larkspur, CA 94939	602	575	-27
<b>Kentfield School District</b>				
Anthony G. Bacich	699 Sir Francis Drake Blvd. Kentfield, CA 94904	680	640	-40
Adaline E. Kent Middle	800 College Avenue Kentfield, CA 94904	535	600	65
<b>San Rafael City Schools District</b>				
Bahia Vista Elementary	125 Bahia Way San Rafael, CA 94901	559	550	-9
San Pedro Elementary	498 Point San Pedro Road San Rafael, CA 94901	416	416	0 <sup>d</sup>
James B. Davidson Middle	280 Woodland Ave San Rafael, CA 94901	973 <sup>b</sup>	1,110	137
San Rafael High	185 Mission Ave San Rafael, CA 94901	980 <sup>b</sup>	1,400	420
Terra Linda High	320 Nova Albion Way San Rafael, CA 94903	995	1,500 <sup>c</sup>	505
<b>Tamalpais Union High School District</b>				
Redwood High School	395 Doherty Drive Larkspur, CA 94939	1,230	1,900	670

<sup>a</sup> Negative numbers indicate that student enrollment is over capacity.

<sup>b</sup> James B. Davidson Middle and San Rafael High Schools enrollment include special education.

<sup>c</sup> This is an estimated capacity.

<sup>d</sup> For 2012-2013, there was no excess capacity at San Pedro Elementary School. The anticipated 2013-2014 enrollment is projected at 475 students, and the District is in the process of adding portable classrooms to the campus.<sup>28</sup>

Source: BMS Design Group, 2012. Larkspur SMART Station Area Plan: Schools Summary. Larkspur-Corte Madera, Kentfield, San Rafael City Schools, and Tamalpais Union High School Districts, 2013.

**(1) Larkspur-Corte Madera School District.** The Larkspur-Corte Madera School District (grades K-8) serves families and students in the cities of Corte Madera and Larkspur. This District is comprised of two schools: The Neil Cummins Elementary School (grades K-4), which is approximately 0.6 miles from the Plan area at 58 Mohawk Avenue, Corte Madera; and the Henry C. Hall Middle School (grades 5-8), which is approximately 1 mile from the Plan area at 200 Doherty Drive, Larkspur.<sup>29</sup>

<sup>28</sup> Chris Thomas, Chief Business Official, 2013. Written communication with LSA Associates, Inc, May 30.

<sup>29</sup> Larkspur, City of, 1990. *General Plan*.

The Larkspur-Corte Madera School District employs 80 full- and part-time teachers and maintains a 19.3 pupil-teacher ratio. The District's average class size is 22 students per class.<sup>30</sup> Currently, the District charges developers a school impact fee of \$3.94 per square foot of residential development (residential development under 500 square feet is exempt) and \$0.51 per square foot of commercial development.<sup>31</sup> The Larkspur-Corte Madera School District uses a student generation rate of 0.367 students for multi-family residential developments.<sup>32, 33</sup>

The 2012-2013 school year enrollment at Neil Cummins Elementary and Henry C. Hall Middle Schools are 800 and 602, respectively. Projected enrollment for the 2013-2014 school year at Neil Cummins Elementary and Henry C. Hall Middle Schools are 830 and 595, respectively.<sup>34</sup> Neil Cummins Elementary and Henry C. Hall Middle Schools would experience an approximately 4 percent increase and 1 percent decrease in enrollment, respectively. The capacities of Neil Cummins Elementary and Henry C. Hall Middle Schools are 845 students and 575 students, respectively. The Neil Cummins Elementary School is currently operating over capacity and Henry C. Hall Middle School is currently operating slightly under capacity.

The Larkspur-Corte Madera School District is studying the potential for expanding existing school sites to accommodate students at Henry C. Hall Middle School and Neil Cummins Elementary School, which are nearing capacity. At a May 12, 2011, meeting, the Facilities Expansion Committee recommended to the District Board that an elementary school be opened at the San Clemente School site, which is located in Corte Madera and is owned by the District and has been leased by Lycée Français La Pérouse (a private school) for several decades.<sup>35</sup> Construction of the school commenced in the summer of 2013.

**(2) Kentfield School District.** The Kentfield School District (grades K-8) serves families and students in the City of Larkspur and Community of Kentfield (unincorporated). The District is comprised of two schools: The Anthony G. Bacich Elementary School (grades K-5), which is approximately 1 mile from the Plan area at 699 Sir Francis Drake Boulevard, Kentfield; and the Adaline E. Kent Middle School (grades 6-8), which is approximately 2 miles from the Plan area at

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<sup>30</sup> Education Data Partnership, 2011. *District Reports: Marin County*. Website: [www.ed-data.k12.ca.us](http://www.ed-data.k12.ca.us) (accessed June 20, 2012).

<sup>31</sup> Urrea, Nichole, 2013. Assistant Business Manager, Larkspur-Corte Madera School District. Written communication with LSA Associates. May 20.

<sup>32</sup> White, Becky, 2013. Business Manager, Larkspur-Corte Madera School District. Written communication with LSA Associates. May 14.

<sup>33</sup> This student generation rate is from the District's Facility consultant and is only based on units constructed over a five-year range (2007-2011), as the developer fee code requires a five year span. This rate was not evaluated for facility planning purposes and may not represent the peak student yields from residential units. Student generation rates vary over time and different ranges may produce higher generation rates.

<sup>34</sup> White, Becky, 2013. Business Manager. op. cit.

<sup>35</sup> BMS Design Group, 2012. *Larkspur SMART Station Area Plan: Schools Summary*.

800 College Avenue, Kentfield.<sup>36</sup> The Kentfield School District does not have a student generation rate for residential developments.<sup>37</sup>

Since 1994, the student population at the Kentfield School District has experienced slight growth. Enrollment has risen from 991 students in the 1993-1994 school year to 1,133 students in 2010-2011, representing an overall gain of approximately 14 percent.<sup>38</sup> The 2012-2013 school year enrollment at Anthony G. Bacich Elementary and Adaline E. Kent Middle Schools are 680 and 535, respectively. Projected enrollment for the 2013-2014 school year at Anthony G. Bacich Elementary and Adaline E. Kent Middle Schools is 710 and 541 students, respectively.<sup>39</sup> Anthony G. Bacich Elementary and Adaline E. Kent Middle Schools would experience 4 and 1 percent increases in enrollment, respectively. The capacities of Anthony G. Bacich Elementary and Adaline E. Kent Middle Schools are 640 students and 600 students, respectively. While the Adaline E. Kent Middle is operating at below capacity and can accommodate future student growth, the Anthony G. Bacich Elementary is over capacity.

The Kentfield School District employs 80 full- and part-time teachers and maintains a 16.5 pupil-teacher ratio. The District's average class size is an average 22 students per class.<sup>40</sup> For residential development, the District charges \$2.89 per square foot (residential development below 500 square feet is exempt) and for commercial development, the District charges \$0.47 per square foot.<sup>41</sup>

**(3) San Rafael City Schools District.** The San Rafael City Schools District is composed of two separate boundaries: the San Rafael City Elementary School District and the San Rafael City High School District. Both the Elementary School District and the High School District are governed by the same School Board and the same District staff; because their boundaries are different it is necessary to maintain a separate elementary and high school district.

The San Rafael Schools District is comprised of 13 schools; however, only five serve the Plan area: the Bahia Vista Elementary School (grades K-5), which is approximately 1 mile from the Plan area at 125 Bahia Way, San Rafael; the San Pedro Elementary School (grades K-5), which is located approximately 5 miles from the Plan area at 498 Point San Pedro Road, San Rafael; the James B. Davidson Middle School (grades 6-8), which is approximately 2 miles from the Plan area at 280 Woodland Ave, San Rafael; the San Rafael High School (grades 9-12), which is approximately 2 miles from the Plan area at 185 Mission Ave San Rafael; and the Terra Linda High School (grades 9-12), which is approximately 6 miles from the Plan area at 320 Nova Albion Way.<sup>42</sup> The San Rafael

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<sup>36</sup> Education Data Partnership, 2011. *School Reports: Marin County*. Website: [www.ed-data.k12.ca.us](http://www.ed-data.k12.ca.us) (accessed June 20, 2012).

<sup>37</sup> Pesenti, Sylvia, 2013. Administrative Assistant to Superintendent, Kentfield School District. Written communication with LSA Associates. April 4.

<sup>38</sup> Lucile Packard Foundation for Children's Health, 2011. Kentfield Elementary: Demographics. Website: [www.kidsdata.org/Data/Region/Dashboard.aspx?gsa=1&loc=232](http://www.kidsdata.org/Data/Region/Dashboard.aspx?gsa=1&loc=232) (accessed June 19, 2012).

<sup>39</sup> Pesenti, Sylvia, 2013. Administrative Assistant to Superintendent, Kentfield School District, op. cit.

<sup>40</sup> Education Data Partnership, 2011, *School Reports: Marin County*, op. cit.

<sup>41</sup> Higgs, Michelle, 2012. Administrative Assistant, Facilities, San Rafael City Schools District. Written communication with LSA Associates. June 21.

<sup>42</sup> Education Data Partnership, 2011, *School Reports: Marin County*, op. cit.

High School District is an open enrollment district, which means that any student who lives in San Rafael may choose to attend either San Rafael High School or Terra Linda High School.<sup>43</sup>

The 2012-2013 school year enrollment at Bahia Vista Elementary, San Pedro Elementary, and James B. Davidson Middle Schools are 559, 416, and 973, respectively.<sup>44</sup> The 2012-2013 school year enrollment at San Rafael and Terra Linda High Schools are 980 and 995, respectively,<sup>45,46,47</sup> representing approximately 63 percent of current District-wide enrollment (approximately 6,275 students). Projected District-wide enrollment for the 2013-2014 school year is 6,519. The San Rafael Schools District would experience a 4 percent increase in enrollment. The capacities of Bahia Vista Elementary, San Pedro Elementary, and James B. Davidson Middle, are 510, 416, and 1,110, respectively. The estimated capacities of San Rafael and Terra Linda High Schools are 1,400 and 1,500 students, respectively. While James B. Davidson Middle, San Rafael High, and Terra Linda High Schools are operating below capacity, Bahia Vista Elementary School is slightly over capacity. San Pedro Elementary School is currently at capacity, and the San Rafael City Schools District is currently in the process of adding three portable classrooms to San Pedro Elementary School to accommodate some future growth.<sup>48</sup>

The San Rafael City Elementary District employs 213 full- and part-time teachers and maintains a 20.6 pupil-teacher ratio. The Elementary District's average class size during the 2010-11 school year was an average 23 students per class. The San Rafael City High School District employs 111 full- and part-time teachers and maintains a 20.7 pupil-teacher ratio. The High School District's average class size is 26 students per class.<sup>49</sup> Currently, the San Rafael Schools District charges a school fee to residential and commercial developments. For residential development, the High School District charges \$0.91 per square foot and the Elementary School charges \$2.06 per square foot (residential development below 500 square feet is exempt for both). For commercial development, the High School District charges \$0.14 per square foot and the Elementary School District charges \$0.33 per square foot.<sup>50</sup> The San Rafael City School Districts does not have a student generation rate of residential developments.<sup>51</sup>

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<sup>43</sup> San Rafael City Schools, 2013. School Attendance Boundary Information. Website: [srcs.ca.schoolloop.com/myschool](http://srcs.ca.schoolloop.com/myschool). (accessed May 27).

<sup>44</sup> San Pedro Elementary School currently serves as an overflow school for over-capacity elementary and middle schools in the San Rafael City Schools District.

<sup>45</sup> Higgs, Michelle, 2013. Administrative Assistant, Facilities, San Rafael City Schools District. Written communication with LSA Associates. April 10.

<sup>46</sup> Enrollment for James B. Davidson Middle and San Rafael High Schools include enrollment for special education.

<sup>47</sup> Thomas, Chris, 2013. Chief Business Official. San Rafael City Schools District. Verbal communication with LSA Associates. May 30.

<sup>48</sup> Thomas, Chris, 2013. Chief Business Official. San Rafael City Schools District. Written communication with LSA Associates. May 30.

<sup>49</sup> Education Data Partnership, 2011, *School Reports: Marin County*, op. cit.

<sup>50</sup> Pesenti, Sylvia, 2012. Administrative Assistant to Superintendent, Kentfield School District. Written communication with LSA Associates. June 25.

<sup>51</sup> Higgs, Michelle, 2013. Administrative Assistant, Facilities, San Rafael City Schools District. op. cit.

**(4) Tamalpais Union High School District.** The Tamalpais Union High School District serves communities in southern Marin County, including the City of Larkspur and 18 other cities and towns. The Tamalpais Union High School District is comprised of five high schools, three of which serve the Plan area: Redwood High (Larkspur); San Andreas High (Larkspur), which is a continuation school; and Tamiscal High (Larkspur), which is an alternative high school. The City of Larkspur is served by Redwood High School, which is less than 0.5 miles from the Plan area at 395 Doherty Drive, Larkspur.

The 2012-2013 school year enrollment at Redwood High School is 1,230, representing approximately 32 percent of current District-wide enrollment.<sup>52</sup> Projected enrollment (2013-2014 school year) at Redwood High School is 1,329, representing an 8 percent increase in enrollment. Redwood High School is operating below their capacity and can accommodate future student growth.

The Redwood High School employs 83 full- and part-time teachers and maintains an 18.2 pupil-teacher ratio. Redwood High School's average class size is 23 students per class.<sup>53</sup> Currently, the Tamalpais Union High School District does not charge a school fee to developers for either residential or commercial construction.<sup>54</sup> The Tamalpais Union High School District uses an average student generation rate of 0.092 students for new residential developments.<sup>55</sup>

**(5) Private Schools.** There are seven private schools located in Marin, including parochial and independent schools. In the Plan area, these include Marin Primary and Middle School (Pre-8), and Saint Patrick Elementary (K-8).<sup>56</sup>

**(6) Institutions of Higher Education.** There are no college or university educational institutions located in the City of Larkspur. However, there are a number of accredited colleges and universities in the North Bay that provide educational opportunities to Larkspur residents. Larkspur is in the California Community College District-College of Marin (College of Marin), which has two public community colleges: The Kentfield Campus, which is located approximately 2 miles from the Plan area at 835 College Avenue and serves southern Marin; and the Indian Valley Campus, which is located approximately 12 miles from the Plan area at 1800 Ignacio Boulevard, Novato and serves northern Marin. The closest public university is San Francisco State University, which is part of the California State University system. It offers bachelor's degrees in 113 areas of specialization, and master's degrees in 96 areas. Its main campus is located in San Francisco, and it has a student body of over 28,290.

**(7) Regulatory Framework.** This section describes applicable State regulations that pertain to public schools.

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<sup>52</sup> Cloney, Kaley, 2013. Administrative Assistant, Finance and Facilities, Tamalpais Union High School District. Written communication with LSA Associates. April 4.

<sup>53</sup> Education Data Partnership, 2011. *School Reports: Redwood High School*. Website: [www.ed-data.k12.ca.us](http://www.ed-data.k12.ca.us) (accessed June 19, 2012).

<sup>54</sup> Cloney, Kaley, 2012. Administrative Assistant, Finance and Facilities, Tamalpais Union High School District. Written communication with LSA Associates. June 21.

<sup>55</sup> Jack Schreder & Associates, 2012. *Developer Fee Justification Study*. May.

<sup>56</sup> Marin County Office of Education, 2012. *2011-2012 Directory of Marin County Public & Private Schools*.

**State.** Local school districts are empowered under State law to impose school impact fees, which are collected by local governments at the time of building permit issuance. In 1998, the California State Legislature enacted Senate Bill 50 (SB 50), which made significant amendments to existing State law governing school fees. SB 50 prohibited State or local agencies from imposing school impact mitigation fees, dedications, or other requirements in excess of those provided in the statute. Government Code Section 65995(e) provides that where payment has been made to a school district in accordance with the school fee program, that payment is considered full mitigation for school impacts. The legislation also prohibits local agencies from denying or conditioning any project (including a General Plan) based on the inadequacy of school facilities.

**d. City of Larkspur 1990 General Plan.** Policies and actions program that address public services and are applicable to the Station Area Plan are listed below.

*Community Facilities and Services Element*

**Goal 2: Preserve all existing school sites for future public use, with school use having the highest priority.**

- **Policy h:** Encourage school districts not to sell school sites, but to preserve them for community and future school use. Where the opportunity presents itself, the school districts also should be encouraged to consider the development of affordable housing on surplus properties to serve the needs of teachers and other school employees.
- **Policy i:** Look for ways to ease the financial burden on school districts so that school sites can be retained in public ownership.
  - **Action Program [12]:** Work with school districts to examine alternatives to school closure and sale early in the process of responding to declining school enrollments.
- **Policy j:** When school districts apply for interim reuse of surplus facilities, the City encourages that school playing fields, gymnasiums, meeting halls, and auditoriums be retained for public use.

**Goal 3: Achieve greater cooperation between the City and the school districts in sharing resources.**

- **Policy k:** Encourage school boards to work with Larkspur and recreation departments of other cities to expand community uses of school facilities (pools, gyms) during non-school hours.
- **Policy l:** Encourage school districts to make use of public safety and other City staff members to teach students about fire prevention, CPR, drug abuse, bicycle safety, and other subjects.
  - **Action Program [13]:** Identify City staff, facilities, and programs that can be shared with the school districts for educational purposes.

**Goal 6: Renovate and modify public buildings to meet future demands.**

- **Policy p:** Renovate public buildings to conform to seismic safety requirements, space needs, and use of new technology, while respecting historic values.
  - **Action Program [16]:** Rehabilitate City Hall and Fire Station 1 in accordance with structural design standards.
  - **Action Program [17]:** Explore the relocation of Fire Station 1 to allow potential future expansion of city services such as planning, library, recreation, etc., in existing historic building.
- **Policy q:** Coordinate with the Town of Corte Madera to consolidate the two existing police stations of the Twin Cities Police Department at one location.

- Action Program [18]: Survey potential sites, and study the financing and time for development of a single police station.
- Action Program [19]: Consider moving the current police facility to a location other than Piper Park.

**Goal 7: Protect Larkspur residents and property from fire hazards.**

**Goal 8: Minimize the risk of wildland and structural fires, and ensure adequate fire protection.**

- Policy n: Provide fast and efficient fire suppression service to Larkspur residents.
  - Action Program [27]: Establish performance standards such as desired response times for police, fire, and other public services.
- Policy o: Maintain an aggressive fire prevention program.
  - Action Program [28]: Continue to inspect all business, public buildings and apartment buildings annually for fire and building code violations.
  - Action Program [29]: Continue to require that all vacant lots annually be cleared of excessive vegetation.
  - Action Program [30]: Continue to require smoke alarms and Class C or better fire retardant roofs for all new construction.
- Policy p: Establish more stringent fire protection standards for private development in high risk fire hazard areas.
  - Action Program [31]: Require that automatic sprinkler systems be installed in new residences in areas with difficult access and/or poor water supply.
  - Action Program [32]: Require that brush be cleared for a distance of 30 feet from residences in high fire-hazard areas.
  - Action Program [33]: Establish landscaping guidelines that encourage the use of fire-resistant plants in high fire-hazard areas.

**2. Impacts and Mitigation Measures**

This section provides an assessment of the potential impacts related to Larkspur's fire and emergency medical services, police services, and public schools facilities associated with implementation of the Station Area Plan.

**a. Criteria of Significance.** Implementation of the Station Area Plan would have a significant effect on public services if it would:

- Result in a substantial adverse physical impact associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:
  - Fire protection;
  - Police protection;
  - Schools;

**b. Impacts Analysis.** The following discussion describes impacts on public services associated with implementation of the Station Area Plan.

**(1) Fire Protection.** New development associated with the Station Area Plan would be required to meet all LFD, local and State Fire Code requirements for sprinkler systems, alarms, fire flow, access, and fire hydrant spacing. Site specific design plans are required by the Fire Code. The City of Larkspur Building Department would review all construction plans and perform inspection of proposed developments associated with the Station Area Plan to ensure compliance with the Fire Code prior to the issuance of building permits.<sup>57</sup>

The additional residents and employees associated with the implementation of the Station Area Plan would increase demand for fire protection and emergency medical services. LFD does not have a methodology for calculating the need for new officers or facilities (e.g., percentage of population or number of calls). It is anticipated that the population and employment growth resulting from implementation of the Station Area Plan would increase the demand for fire protection services.

Population and employment growth, specifically associated with the proposed residential and hotel uses within the Station Area Plan area, would increase the number of calls to LFD requesting emergency assistance. This increase in the number of calls, combined with increased traffic congestion likely to result from residential and employment growth in the area, could also increase emergency response times. As a result, LFD may be slightly less effective at meeting its target response time (5 to 7 minutes 90 percent of the time) and would not be able to provide an acceptable level of service unless additional staff and fire/paramedical equipment are placed in service.<sup>58</sup>

**Impact PS-1: Implementation of the Station Area Plan could result in the need for additional firefighting equipment and personnel in order to meet the potential new demand generated by development within the Plan area. (S)**

Staffing levels at the LFD are currently low and one of LFD's two engine companies is staffed below industry and regional standards.<sup>59</sup> According to the LFD, upon preliminary review of development associated with the Station Area Plan, specifically, the proposed residential (920 dwelling units) and hotel uses, the following resources would be required to ensure the current level of fire protection and emergency services is maintained in the City after full implementation of the Station Area Plan:

- One engine company;
- One paramedic ambulance unit; and
- Five staff (three staff would operate the engine company and two would operate the paramedic ambulance unit).<sup>60</sup>

<sup>57</sup> Larkspur, City of, 2013. Building Department. Website: [www.ci.larkspur.ca.us/index.aspx?nid=91](http://www.ci.larkspur.ca.us/index.aspx?nid=91) (accessed May 20).

<sup>58</sup> Sinnott, Bob, 2013. Fire Chief. City of Larkspur Fire Department. Written communication with LSA Associates, Inc., May 20.

<sup>59</sup> Ibid.

<sup>60</sup> Ibid.



Fire Station 16, which is the first responder to the Plan area, would need to be structurally modified to accommodate the fire-fighting equipment and increase in LFD staff described above.<sup>61</sup> When any potential modification is proposed, the LFD will undertake the appropriate CEQA review to ensure that any environmental impacts associated with the station modification would be reduced to a less-than-significant level. Additionally, Fire Station 16 is located on already urbanized and developed land that does not support sensitive natural habitats, wetlands, wildlife movement corridors, and protected archaeological resources, physical alteration of the facility would not be expected to result in significant unmitigable secondary environmental impacts.

Implementation of the following mitigation measures would reduce the potential impact related to the provision of fire protection services to a less-than-significant level.

Mitigation Measure PS-1: The City of Larkspur shall identify and implement a formula, which identifies a project applicant's fair share contribution towards station retrofits, staffing, or the purchase of additional firefighting equipment and vehicles in order to serve the additional fire protection services demand generated by new development. The City shall also identify an implementation plan and budget for use of the funds prior to implementing the formula. Payment into this fund shall be a condition of development approval. (LTS)

**(2) Police Protection.** The additional residents and employees associated with the implementation of the Station Area Plan would increase demand for law enforcement services. As previously described, the CMPA calculates the need for new officers based on the number of officers per capita. The County average, which serves as a benchmark, is 2.03 officers per 1,000 people. CMPA is currently at 1.3 officers per 1,000 people. As previously noted, the CMPA does not have adopted response times, but reported an average response time of approximately 3 minutes and 30 seconds for priority 1 calls in 2013. Potential increased traffic congestion likely to result from future development associated with the Station Area Plan, could increase emergency response times. As a result, CMPA may be less effective at responding to emergency calls.

Development associated with the implementation of the Station Area Plan, and the need for local police to respond to incidents occurring at the SMART station or within the Plan area, would increase the demand for police services. Some of the increased demand in the Larkspur Plan area could be partially alleviated through SMART's proposed system security. System security would be provided by SMART, either in-house or by contract, and fare inspectors and station personnel would also be part of the system security and would provide additional surveillance to deter crime.<sup>62</sup>

According to CMPA, upon preliminary review of development associated with the Station Area Plan, CMPA would require additional police personnel and equipment to ensure that the current level of law enforcement services is maintained in the City.<sup>63</sup> The additional police personnel and equipment would impact CMPA's general fund budget. However, no additional police facilities or structures

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<sup>61</sup> Ibid.

<sup>62</sup> Parsons Brinckerhoff Quade & Douglas, Inc., 2005. SMART District Project Environmental Impact Report. November.

<sup>63</sup> Cusimano, op. cit.

would need to be constructed to serve the development associated with the Station Area Plan.<sup>64</sup> Therefore, the proposed project would not result in significant physical environmental impacts related to the need for new or altered police facilities.

(3) **Schools.** The construction of new housing (920 total dwelling units) in the City as a result of Station Area Plan implementation could generate approximately 420 students, based on student generation rates shown in Table IV.K-4. The table shows the projected distribution of new students in each school district. Student generation rates used by each school district to predict the number of students that would be generated by new multi-family residential development generally have a lower student generation rate than single-family units.

**Table IV.K-4: Student Generation Yield by School District**

District	Additional Dwelling Units at Full Implementation of Station Area Plan	Student Generation Rate Used by School District for Multi-Family Residential	Additional Students Generated at Full Implementation of Station Area Plan
San Rafael City Schools	850	Elementary/Middle School: 0.367 <sup>a</sup>	311
		High School: 0.092 <sup>a</sup>	78
Tamalpais Union High School	70	0.092 <sup>b</sup>	6
Larkspur/Corte Madera School	0	0.367	0
Kentfield School	70	0.367 <sup>c</sup>	25
<b>Plan Area Total:</b>			<b>420</b>

<sup>a</sup> The San Rafael City Schools District does not have a student generation rate of residential developments. For this analysis, student generation rates from Larkspur/Corte Madera School District (for elementary and middle school) and Tamalpais Union High School District (for high school) are used for the San Rafael City Schools District.

<sup>b</sup> Student generation rate provided by Jack Schreder & Associates, 2012.

<sup>c</sup> The Kentfield School District does not have a student generation rate of residential developments. For this analysis, student generation rate from Larkspur/Corte Madera School District (for elementary and middle school) is used for the Kentfield District.

Source: LSA Associates, Inc., 2013.

*San Rafael City Schools District.* As shown in Table IV.K-3, the Bahia Vista Elementary School is currently slightly over-capacity, and according to the San Rafael City Schools District, San Pedro Elementary School is currently at capacity.<sup>65</sup> Based on the student generation rates shown in Table IV.K-4, the addition of 850 dwelling units in the Plan Area that are within the San Rafael City Schools boundary would generate approximately 311 new elementary and middle school students, and 78 high school students within the San Rafael City Schools District.

Because existing elementary and middle schools (grades K-8) within the San Rafael City Schools District are currently operating at capacity, the San Rafael City Schools District would not be able to accommodate additional students generated by development associated with the Station Area Plan in

<sup>64</sup> Ibid.

<sup>65</sup> Thomas, Chris, 2013. Chief Business Official. San Rafael City Schools District. Written communication with LSA Associates. May 30.

its existing facilities.<sup>66</sup> Specifically, the San Rafael City Schools District is experiencing considerable growth in its kindergarten enrollment. This level of growth would likely result in higher enrollment numbers in already at-capacity elementary schools as enrolled schoolchildren advance up to each grade.<sup>67</sup> The San Rafael City School District is currently in the early stages of a master planning process to address existing and anticipated facility constraints and capacity issues.<sup>68</sup>

The additional 311 elementary and middle school students would exceed the current capacities available within Bahia Vista, San Pedro, and James B. Davidson Middle schools. Due to the recent growth trend at the San Rafael City Schools District's elementary schools, planned new facilities would likely be needed to accommodate additional students generated by the implementation of the Station Area Plan.<sup>69</sup> The additional 78 high school students would not exceed the current excess capacity available at San Rafael and Terra Linda High Schools.

In order to fund the development and construction of new school facilities, the San Rafael City Schools would impose a school impact fee of \$2.06 per square foot of residential development for the elementary and middle schools, and \$0.91 per square foot of residential development for the high school. San Rafael City Schools would impose a school impact fee school impact fee of \$0.33 per square foot of commercial development for the elementary and middle schools, and \$0.14 per square foot of commercial development for the high school.

*Tamalpais Union High School District.* As shown in Table IV.K-3, Tamalpais Union High School District is currently operating below their capacity at Redwood High School. Based on the student generation rates shown in Table IV.K-4, the addition of 70 dwelling units in the Plan Area that are within the Tamalpais Union High School boundary would generate approximately six new high school students. The additional six new students would not exceed the current excess capacity available within Redwood High School, and as a result, would not require the construction of new facilities to serve the increased high school student population.

*Larkspur-Corte Madera School District.* Residential development associated with the Station Area Plan is not located within the Larkspur-Corte Madera School District boundary.<sup>70</sup> Therefore, no students within the Larkspur-Corte Madera School District would be generated from full implementation of the Station Area Plan.

*Kentfield School District.* As shown in Table IV.K-3, the Kentfield School District is currently over-capacity at Anthony G. Bacich Elementary School. Based on the student generation rates shown in Table IV.K-4, the addition of 70 dwelling units in the Plan Area that are within Kentfield School District boundary would generate approximately 25 new elementary and middle school students. The additional 25 elementary and middle school students would exceed the current excess capacity

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<sup>66</sup> Thomas, Chris, 2013. Chief Business Official. San Rafael City Schools District. Verbal communication with LSA Associates. May 30.

<sup>67</sup> Ibid.

<sup>68</sup> Ibid.

<sup>69</sup> Ibid.

<sup>70</sup> White, Becky, 2013. Business Manager. Larkspur-Corte Madera School District. Written communication with LSA Associates. May 21.

available within Anthony G. Bacich and Adaline E. Kent Middle Schools, and as a result, could require the construction of new facilities to serve the increased elementary and middle school student population. In order to fund the development and construction of new school facilities, the Kentfield School District could impose a school impact fee of \$2.89 per square foot of residential development (residential developments less than 500 square feet are exempt from this fee) and \$0.47 per square foot of commercial development.

*School Impact Fees.* As discussed above, new school facilities would likely be needed to accommodate anticipated increases in student enrollment resulting from implementation of the Station Area Plan. These school facilities would be funded in part by new development that would occur as part of Station Area Plan implementation. New projects in Larkspur are subject to statutory fees established by the State. These fees are used for the construction of new school facilities, which would be built to accommodate increased student enrollment resulting from development. Payment by developers of statutory fees would provide funding for planned school projects. Once funded, the school districts are responsible for identifying the location of new school facilities and undertaking acquisition, design, and construction of the facilities.

The school districts are responsible for implementing the specific methods of mitigating school impacts under the Government Code. The school impact fees and the school districts' methods of implementing measures specified by Government Code 65996 are meant to offset increased student enrollment. Payment of school facility mitigation fees has been deemed by the State legislature (per Government Code Section 65995(h)) to constitute full and complete mitigation of impacts of a development project on the provision of adequate school facilities, even though, as a practical matter, additional funding, usually from statewide or local bond measures, are needed to create new school capacity. Specific school facility developments would be subject to environmental review on a project-by-project basis.

Development associated with the implementation of the Station Area Plan would be subject to fund necessary school service and facility improvements to accommodate anticipated school enrollment growth within the school district areas. Therefore, through the payment of associated development fees, compliance with applicable State and local regulations, implementation of the Station Area Plan would have a less-than-significant impact on school facilities.

**c. Cumulative Impacts of the Station Area Plan.** Cumulative impacts associated with fire protection and police services that would occur under the Station Area Plan would occur entirely within the LFD and TCPA service areas. Expected increases in demand for fire and police services would thus be spatially limited and would not make a considerable contribution to increased demand for these public services in the region. Therefore, cumulative impacts to fire and police services are expected to be less than significant. Additionally, the City will consider the environmental effects of new facilities at a project level when they are proposed over time.

For school services, the geographic setting for cumulative impacts includes Larkspur-Corte Madera School District, Kentfield School District, San Rafael City Schools District, and Tamalpais Union High School Districts service areas, which include cities and towns in southern Marin County, including Larkspur, Corte Madera, San Rafael, and Kentfield. As expected residential and non-residential growth occurs within the four school service areas, increased demand would be placed on the school districts' services and facilities. The Larkspur-Corte Madera School and San Rafael City Schools Districts are currently studying the potential for expanding existing school sites and planned facilities to accommodate a growing student population, which would occur even without implementation of the Station Area Plan. The cumulative demand within all four school districts is expected to increase as a result of implementation of the Station Area Plan, as well as other population growth within these school districts.

With current K-8 enrollment at the Larkspur-Corte Madera School District, Kentfield School District, and San Rafael City Schools District (specifically elementary schools) schools nearing or exceeding capacity, implementation of the Station Area Plan would result in a potentially significant cumulative impact on schools. However, any development carried out under the Station Area Plan, or other development proposed within the school districts, that may affect service levels within the four school districts would be required to contribute school facility fees in conformance with State law and Districts' requirements. School impact fees are deemed by statute to constitute full mitigation to reduce the impact of development projects on school facilities. Therefore, cumulative impacts of development on school district facilities would be less than significant. Additionally, the school districts will conduct their own environmental analysis to address proposals for new facilities and will address project-level adverse environmental impacts on a case by case basis at that time.