6.6 PARKS AND OPEN SPACE

6.6.1 INTRODUCTION

This section generally describes existing recreational facilities in the Sacramento area and within the vicinity of the project site. It also provides a discussion of impacts of the proposed project on local and regional recreational facilities, and evaluates the adequacy of the recreational facilities included as part of the proposed project in meeting the recreational demand generated by the proposed Greenbriar development.

6.6.2 ENVIRONMENTAL SETTING

The project area is currently located within the jurisdictional boundaries of the County of Sacramento (County), but would be subject to annexation into the City with approval of the proposed project. Therefore, the City's existing park and recreation facilities and open space areas and policies and standards related to these facilities are described below. Because of the regional nature of park and open space facilities, and because open space resources are considered a key resource prior to annexation of the project site by the Sacramento LAFCo, County parkland and open space resources are also described below. No local or regional parks or bikeways are currently located within the project area, which is currently undeveloped land that supports agricultural land uses.

COUNTY OF SACRAMENTO PARKLAND AND OPEN SPACE

The Greenbriar project area is currently located within the jurisdiction of the County Department of Regional Parks, Recreation and Open Space. From 1975 to 1995, the total acreage managed by the County increased by 250%. The County currently maintains more than 14,000 acres of open space and recreation areas, among them the 23-mile-long American River Parkway; numerous parks, recreation, and river access points; the Effie Yeaw Nature Center; four golf courses; and various historic, cultural, and natural resources (County of Sacramento 2005). Discovery Park, at the west end of the Jedediah Smith Bike Trail in the American River Parkway, is approximately 6 miles south-southeast of the project site. The County manages three regional parks (Elk Grove Park, Gibson Ranch, and Mather Regional Park); the 345-acre Gibson Ranch County Park, located approximately 9 miles northeast of the site, is the closest of the County's regional parks to the project site. The County operates the Elkhorn Boat Launching Facility and picnic area along the Sacramento River west of Sacramento International Airport, approximately 6 miles west of the project site.

The project site is not located within the boundaries of any specific County park district (Sacramento LAFCo 2003).

The *County of Sacramento General Plan* (County General Plan) land use diagram identifies much of Sacramento County as open space. Major open space areas include the islands, waterways, and wetlands of the Sacramento–San Joaquin Delta (including the Stone Lakes complex); the extensive Cosumnes River floodplain; oak woodlands and grasslands extending from State Route 50 south to San Joaquin in the east county; agricultural lands in the North Natomas area; and the gentle swales of the East Vineyard and Douglas-Sunrise areas containing innumerable vernal pools. Within the urban area, the American River Parkway stands apart as the dominant open space feature. Other notable planned open spaces in the urban area include Del Paso, Hansen, and Land Parks in the city, Dry Creek in Rio Linda, and the buffer lands around the Sacramento Regional Wastewater Treatment Plant (County of Sacramento 1993).

Sacramento County has been among the top 10 urbanizing counties as well as in the top ranks for net loss of irrigated land as mapped between 1988 and 2002 by the Farmland Mapping and Monitoring Program (FMMP) of the California Department of Conservation's Division of Land Resource Protection. Growth in urban land has averaged more than 4,000 acres per biennial FMMP map update since 1988 (California Department of Conservation 2005). Between 1990 and 1998, the total area of agricultural lands in Sacramento County decreased from 419,000 acres to about 402,000 acres, a 4.2% decrease. During this same period, urban lands increased from 137,374 acres to more than 150,716 acres, a 9.7% increase. (Sacramento Environmental Commission 2000.) The

project vicinity is no exception to this trend of urbanization, as the project site is within a portion of Sacramento County that historically has been devoted to agriculture, but is seeing rapid urban development replace much of this open space. The North Natomas Community Plan (NNCP) area has a current population of 14,865 that is expected to grow to 45,040 by 2015 and 66,495 by 2025 (SACOG 2005).

While Exhibit 6.6-1 depicts open space areas in Sacramento County at the time of the County General Plan (1993), a comparison of past, present, and projected open space areas within Sacramento County cannot be made with certainty for purposes of this EIR analysis. The County General Plan's open space map does not indicate land use acreages, and the County does not keep a detailed accounting of past, current, or projected countywide open space acreage and potential acreage loss (County of Sacramento 1993; Defanti, pers. comm., 2005). Furthermore, the Sacramento Area Council of Governments (SACOG) does not specifically monitor open space acreages within the jurisdictions it covers. Although SACOG completed a study of open space in 2001, the data from this 2001 analysis are questionable because each jurisdiction has its own definition of open space (Hossack, pers. comm., 2005), and the projections for Sacramento County in SACOG's Preferred Blueprint Scenario for year 2050 do not include open space acreage numbers (SACOG 2004).

CITY OF SACRAMENTO FACILITIES

Existing Facilities

The City currently owns and operates 204 park and recreational facility sites (including golf courses and Camp Sacramento, located in El Dorado County) comprising 3,657 acres, plus 81 miles of on- and off-road bikeways and trails, 17 lakes/ponds or beaches, and extensive recreation facilities in the City parks. Of the 204 sites, 33 were added between 1989 and the adoption of the City Parks and Recreation Master Plan in December 2004. Approximately 703 of the 3,657 acres of City parks are neighborhood serving and 860 acres are community serving. (City of Sacramento 2004a.) With approval of the proposed project and annexation of the project site into the City, the site would be included in the Department of Parks and Recreation's North Natomas Community Planning Area. The City operates other types of recreational facilities including a senior center, 11 community centers, and four clubhouses (i.e., activity buildings available for rental by the public for small parties, gatherings, or meetings). The closest existing parks to the project site are the 7.2-acre Kokomo Park, 4.3-acre Westhampton Park, and 4.0-acre Egret Park (Phase 1), each located approximately 1 mile from the site within the NNCP area. Several future park sites are proposed just east of SR 70/99 and south of Interstate 5. (City of Sacramento 2004b, 2004c.) North Natomas Regional Park under phased construction in the NNCP area (located at Natomas Park Drive at Natomas Boulevard) and serves the project site; however, the 172-acre site is only partially developed with landscaping, walkways, and bikeways (City of Sacramento 2004a, 2005).

The *City of Sacramento General Plan Update: Technical Background Report* (City of Sacramento 2005) states that as of December 2004, approximately 12,946 acres of land in the City's Policy Area (i.e., the City boundaries and sphere of influence, plus additional areas to which adopted City policies may relate), or 12% of the existing land in this area, were in agricultural use, with a large portion of the existing agricultural land located in North Natomas. Open space areas comprised 122 acres (less than 1%) of land area within the City imits. Within the City's Policy Area, open space areas comprised 1,488 acres (1% of the land in this area) (City of Sacramento 2005). According to the *City of Sacramento Parks and Recreation Master Plan 2005–2010* (City Parks and Recreation Master Plan), the City has 657.4 acres of open space as part of its "Citywide/Regionally Serving" acreage (see "Provision of Recreation Areas" in Section 6.6.3, "Regulatory Setting," below); this acreage includes portiole buffers between habitat areas and development or lands required for environmental mitigation (City of Sacramento 2004a). As described under "Provision of Recreation Areas" below, the City has goals to provide 8 acres per 1,000 residents of citywide/regionally serving park acres, including regional parks, linear parks/parkways and open spaces as part of the City's public parks and recreation system (City of Sacramento 2004a; Tindell, pers. comm., 2005).



Source: County of Sacramento 1993, data compiled by EDAW in 2005

Open Space in Sacramento County

Exhibit 6.6-1

Facilities Compared with Plan Standards

On the basis of the standards listed in the *City of Sacramento General Plan* (City General Plan) and the City Parks and Recreation Master Plan (see Section 6.6.3, "Regulatory Setting," below), the City had a deficit in neighborhood and community parks acreage (considered together) of less than 20 acres and no deficit in citywide/regionally serving park acres, as of December 2004, when portions of public school sites in the City open to the public after school hours are considered to help meet service level goals for recreation facilities. With project population growth, however, through 2010, the City's goal is to eliminate projected acreage deficiencies by year 2010, the end date of the current Master Plan. (City of Sacramento 2004a.) Areas underserved have been identified in older developed areas such as Land Park, North Sacramento, South Sacramento, and the Central City, while gaps in service have been identified at various undeveloped existing sites around the City, including in North Natomas. However, the City regularly takes steps to eliminate these gaps in service, such as encouraging joint use and joint development of school sites and private facilities; planning new community parks for existing neighborhoods; pursuing opportunities to develop parkland as new development occurs and funding sources are secured; and pursuing funding to complete development of regional parks such as North Natomas Regional Park (City of Sacramento 2004a).

6.6.3 REGULATORY SETTING

FEDERAL

Americans with Disabilities Act

The Americans with Disabilities Act (ADA) of 1990 (42 United States Code [USC] 12181) prohibits discrimination on the basis of disability in public accommodation and state and local government services. Under the ADA, the Architectural and Transportation Barriers Compliance Board issues guidelines to ensure that facilities, public sidewalks, and street crossings are accessible to individuals with disabilities. Typical ADA improvements include creating handicap parking spaces, restroom modifications, door hardware requirements, and lighting upgrades. Play areas, meeting rooms, park restrooms, and other buildings and park structures must comply with ADA requirements. Park facilities under the proposed project or any project alternative would be required to be ADA compliant.

STATE

Quimby Act

The Quimby Act (California Government Code Section 66477) was established by the California legislature in 1965 to preserve open space and parkland in the rapidly urbanizing areas of the state. This legislation was in response to California's increased rate of urbanization and the need to preserve open space and provide parks and recreation facilities for California's growing communities. The Quimby Act authorizes local governments to establish ordinances requiring developers of new subdivisions to dedicate land for parks, pay an in-lieu fee, or perform a combination of the two.

The Quimby Act provides two standards for the dedication of land for use as parkland. If the existing area of parkland in a community is greater than 3 acres per 1,000 persons, then the community may require dedication based on a standard of up to 5 acres per 1,000 persons residing in the subdivision. If the existing amount of parkland in a community is less than 3 acres per 1,000 persons, then the community may require dedication based on a standard of only 3 acres per 1,000 persons residing in the subdivision. The Quimby Act requires a city or county to adopt standards for recreational facilities in its general plan recreation element if it is to adopt a parkland dedication/fee ordinance.

Both the County and the City collect Quimby Act in lieu fees. These fees contribute to a fund that would be used to acquire properties for parkland. Because the Greenbriar project site is currently located within the County but would be subject to annexation by the City if approved the City's standards for parkland dedication under the Quimby Act are provided in the discussion of local regulations below.

LOCAL

City Standards for Parkland Dedication

Chapter 16.64 of the City Code provides the City's standards for the dedication of parkland and/or payment of inlieu fees under the Quimby Act. To determine the required parkland dedication, the City multiplies the number of dwelling units by specified factors to produce 5 acres per 1,000 residents. The same calculation factor (0.0149) is used by the City for both single-family (low-density) and medium-density housing (Wackford, pers. comm., 2005), while the calculation factor for high-density housing is lower (0.0088). Lakes and open-space buffer areas required for habitat protection are not included in the overall calculation of parkland dedication requirements, although they could provide a recreational benefit.

City and County of Sacramento Joint Vision for Natomas

In the late 1990s, the City and County of Sacramento were each considering projects that would urbanize a substantial portion of the Natomas Basin. Both jurisdictions determined that it would be mutually beneficial to plan the area cooperatively. Starting in 2001, City and County staff met to discuss a process for planning the unincorporated Natomas area. This gave rise to the City/County Joint Vision for Natomas. The two jurisdictions coordinated and along with input from stakeholders created the basic principles for development in the area. On December 10, 2002, the Sacramento City Council and the County Board of Supervisors approved a Memorandum of Understanding (MOU) that outlined a joint vision for land use and revenue sharing principles for Natomas. The MOU recognizes the City as the agent of development and the County as the agent of permanent open space protection, including farmlands and habitat.

The MOU expresses the County's and City's desires for development within the Natomas Basin, but it does not provide binding land use policies for either agency. The following are among the principles to which the County and City agreed through the MOU (City of Sacramento, County of Sacramento 2002), and are applicable to consideration of open-space issues.

Principles on Open Space

- 1. Open space planning will rely on, and coordinate with, existing open space programs and will address linkage issues. Some specific areas will be designated for preservation as permanent open space to provide assurance that community separators are implemented. Other areas, such as west of Sacramento International Airport, may not require active preservation because of specific constraints related to inadequate infrastructure or public ownership.
- 2. Open space mitigation may be in conjunction with or distinct from any applicable criteria of the Natomas Basin Habitat Conservation Plan (NBHCP) and may, depending upon circumstances, exceed that of the NBHCP. A joint funding mechanism will provide funding for land and easement acquisitions.
- 3. Land to be preserved as farmland must not be restricted by nearby development and needs to have a secure supply of affordable water. Buffer areas will be derived from developing lands.

Principles on Future Growth

1. Consideration of new growth should be done in partnership with the preservation of open space. The urban form should include a well-integrated mixture of residential, employment, commercial, and civic uses,

interdependent on quality transit service with connections linking activity centers with streets, transit routes, and linear parkways with pedestrian/bike trails.

The open space principles provide an agreement regarding the size, location, and nature of open space preservation areas within the Natomas area, while the future growth principles provide a vision of the location, size, and nature of future growth. Regarding open space, the City and County have agreed to implement a principle that would require new development to preserve permanent open space in the Natomas area at a mitigation ratio of 1 acre of lost open space to 1 acre of preserved open space.

City of Sacramento General Plan

Recreation Policies

The Public Facilities and Services Element of the City General Plan (City of Sacramento 1988 as amended December 2004) includes several policies and standards related to recreation. With the proposed annexation of the project area into the City, the City standards would apply. The following policies are applicable to the proposed project.

- **Goal A:** Provide adequate parks and recreational services in all parts of the City, adapted to the needs and desires of each neighborhood and community. Attempt to achieve the Acreage Service Level Goals established in the Parks and Recreation Master Plan.
 - **Policy 1:** Encourage private development of recreational facilities that complement and supplement the public recreational system.
 - **Policy 3:** Encourage joint development of parks with compatible uses such as new schools, libraries, and detention basins.
 - **Policy 5:** Design parks to enhance and preserve the natural site characteristics and environmental values.
 - Policy 6: Review all necessary infrastructure improvements for their potential park and open space usage.
 - **Policy 7:** Locate community and regional parks and linear recreational areas on or adjacent to major thoroughfares.
 - **Policy 9:** Continue the practice of partnering with school districts and the community to provide neighborhood or community serving outdoor recreation facilities on and adjacent to public schools.
 - **Policy 10:** Develop and implement programs to help ensure the safety of residents utilizing the parks and recreational facilities.

Natural Resources Policies

Preservation of Natural Resources

- ► Goal A: Implement the Master Plan for Parks and Recreation.
 - **Policy 4:** Establish a system of open space, buffers, and view sheds that act as neighborhood gateways, and as visual and physical community separators and greenbelts to define the limits of urban growth (City Council Resolution No. 2004-906, December 7, 2004).

Open Space Policies

The Conservation and Open Space Element of the City General Plan (City of Sacramento 1988) is also pertinent to the discussion of parks and open space in this EIR. Relevant policies from this section are listed below.

Conservation of, and Open Space Used for, the Managed Production of Resources

- Goal A: Retain land inside the City for agricultural use until the need arises for development, and support actions of Sacramento County to similarly conserve its land until needed for urban growth.
 - **Policy 1:** Phase the conversion of agricultural lands to urban uses while implementing the policies of the North Natomas Community Plan.

Recreation Area Types

The City General Plan identifies urban plaza/pocket parks, neighborhood parks, community parks, regional parks, parkways, dedicated open space, and joint use school sites (described in Table 6.6-1) as the types of parkland that would fulfill the active and passive recreation needs of the community as described in the public facilities policies.

Provision of Recreation Areas

The current City General Plan and the City Parks and Recreation Master Plan (City of Sacramento 2004a) include the following park acreage Service Level Goals:

- ▶ neighborhood serving areas, 2.5 acres per 1,000 residents;
- ► community serving areas, 2.5 acres per 1,000 residents; and
- ► citywide/regional serving areas, 8 acres per 1,000 residents.

The City General Plan formerly had a standard of 5 acres per 1,000 residents for regional parks, but the General Plan was formally amended in December 2004 for consistently with the Master Plan (Tindell, pers. comm., 2005).

When determining whether the City is meeting its Service Level Goals, the City considers neighborhood parks and community parks together as "Neighborhood/Community Serving" acreage, with a total goal of 5 acres per 1,000 residents. Included in the "citywide/regionally serving" Service Level Goal are regional parks, linear parks/parkways, and open space. These three types of facilities are considered together toward the goal of 8 acres per 1,000 residents (City of Sacramento 2004a; Tindell, pers. comm., 2005).

On the basis of the standards listed in the *City of Sacramento General Plan* (City General Plan) and the City Parks and Recreation Master Plan (see Section 6.6.3, "Regulatory Setting," below), the City had a deficit in neighborhood and community parks acreage (considered together) of less than 20 acres and no deficit in citywide/regionally serving park acres, as of December 2004, when portions of public school sites in the City open to the public after school hours are considered to help meet service level goals for recreation facilities. With project population growth, however, through 2010, the City's goal is to eliminate projected acreage deficiencies by year 2010, the end date of the current Master Plan (City of Sacramento 2004a.).

The project's consistency with the above City policies is evaluated in Chapter 5.0, "Project Consistency with Plans and policies."

LAFCo

The Policies, Standards, and Procedures document (Sacramento LAFCo 1993) include standards regarding the Sacramento LAFCo's powers to conserve agricultural land. LAFCo will approve a proposed change of

Table 6.6-1 Park Category Descriptions			
Park Category	Size Guidelines	Service Area Guidelines	Description
Neighborhood S	Serving:		
Neighborhood Parks	5 to 10 acres	½ mile	A park intended to be used primarily by the people who live nearby, or within walking or bicycling distance of the park. Some neighborhood parks are situated adjacent to an elementary school and improvements are usually oriented toward the recreation needs of children. Park amenities may include: a tot lot, an adventure area, unlighted sport fields or sport courts, and/or a group picnic area, and parking limited to on- street.
Urban plazas/ pocket parks	Less than 5 acres	½ mile	A specialized neighborhood park or facility to be used primarily by persons living, working, or visiting nearby. Likely more appropriate for areas denser urban and mixed-use development. Amenities may include: smaller scale features such as community gardens, children's play areas, sitting areas, tables, fountains, hardscape, public art, walkways and landscaping.
Primary Design Elements			Basic landscaping/irrigation/turf/trees; site furniture/walksways/entry improvements/signage/drinking fountain; children's play area (tot lot and adventure area); picnic area with shade structure; sport court; sports field
Community Ser	ving:		
Community Parks Primary Design	10 to 60 acres	2–3 miles; drivable from several neighborhoods	A park or facility developed primarily to meet the requirements of a large portion of the City. In addition to neighborhood park amenities, a community park may include: a large group picnic area with shade structure, a community garden, a neighborhood/community skate park, restroom, on-site parking, bicycle trail, a nature area, a dog park, lighted sport fields or sport courts. Specialized facilities may also be found in a community park including: a community center, a water play area and/or a swimming pool. Some of the smaller community parks may be dedicated to one use, and some elements of the park may be leased to community groups. All Neighborhood park primary design elements; water element; field
Elements			lighting; sports complex; amphitheater; restroom; parking lot; nature area.
Citywide/Region	nally Serving:		
Regional Parks	Varies; generally larger than community parks and/or have destination attraction(s)	Citywide & beyond	A park or facility developed with a wide range of amenities, which are not found in neighborhood or community parks to meet the needs of the entire City population. In addition to those amenities found in neighborhood and community parks, improvements may include: a golf course, marina, amusement area, zoo, and other region-wide attractions. Some facilities in the park may be under lease to community groups.
Open Space/ Parkways			Open spaces are natural areas that are set aside primarily to enhance the City's environmental amenities. Recreational use of these areas may be limited to natural features of the sites, such as native plant communities or wildlife habitat. Parkways are similar to open space areas because they also have limited recreational uses. They are used primarily as corridors for pedestrians and bicyclists, linking residential areas to schools, parks and trail systems. Parkways are typically linear and narrow and may be situated along a waterway, abandoned railroad, or other common corridor.

organization or reorganization (such as an annexation) that will result in the conversion to other uses of prime agricultural land in open space use only if it finds that the proposal will lead to the "planned, orderly, and efficient" development of an area. To be considered planned, orderly, and efficient, the proposal must meet the following criteria:

- The land to be reorganized must be contiguous to lands developed with an urban use or lands that have received all discretionary approvals for urban development.
- The proposed development must be consistent with the applicable jurisdiction's Spheres of Influence Plan, including the Master Services Element.
- Development of all or a substantial portion of the land in question is likely to occur within 5 years. Annexation should be phased if the development is very large.
- Insufficient vacant nonprime lands exist within the applicable Spheres of Influence that are planned, accessible, and developable for the same general type of use.
- The proposal will have no significant adverse effect on the physical and economic integrity of other agricultural lands. In determining whether there will be a significant adverse effect, LAFCo will consider the agricultural significance and use of the land in question, as well as adjacent areas; potential for public facilities associated with the proposal to facilitate the conversion of adjacent or nearby agricultural land; natural or artificial barriers between adjacent agricultural land and the proposed development; and applicable policies regarding open space, land use, and growth management.

LAFCo will not find a proposed development consistent with a jurisdiction's sphere of influence unless the applicable jurisdiction has:

- ▶ prepared and approved a Spheres of Influence Plan,
- ▶ identified all prime agricultural land within the sphere of influence,
- enacted measures to preserve such land, and
- adopted in its General Plan measures to encourage infill development as an alternative to development of agricultural lands.

The project's consistency with LAFCo's policies is evaluated in Chapter 5.0, "Project Consistency with Plans and Policies."

6.6.4 IMPACTS AND MITIGATION

METHOD OF ANALYSIS

Analysis provided in this section is based on information obtained from the City General Plan, the *City of Sacramento General Plan Update: Technical Background Report* (City of Sacramento 2005), the City Parks and Recreation Master Plan (City of Sacramento 2004a), and the City Code. Existing and planned future recreational facilities were compared with relevant City General Plan policies and City Code requirements to determine whether the proposed facilities would be adequate to meet the demand created by the proposed project. The effects of construction of new recreational facilities proposed throughout the project footprint are evaluated throughout this EIR, and therefore are not discussed further in this section.

THRESHOLDS OF SIGNIFICANCE

The proposed project would result in a significant park and open space impact based on the State CEQA Guidelines (Appendix G), if it would:

- increase demand on existing neighborhood and community parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- ► result in the substantial loss of open space resources.

IMPACTS AND MITIGATION MEASURES

IMPACT 6.6-1

Increased Demand for City Neighborhood and Community Parks. A prescribed formula in the City's Quimby Act land dedication ordinance is used to determine how much parkland must be provided by proposed developments to meet demand generated by new residents. Based on application of this formula, residential development under the proposed project would require 48.2 net acres of parks. The proposed project would provide approximately 48.4 net acres of neighborhood and community parks. Therefore, the proposed project would provide sufficient parkland to meet the City's standards for parkland dedication, and thus would provide sufficient park facilities to meet demand. This impact would be **less than significant**.

The City's standard for parkland dedication under the City's Quimby Act land dedication ordinance (City Code Title 16, Chapter 16.64) is 5 acres of parkland per 1,000 residents. New developments that do not meet this acreage standard must pay an in-lieu fee to the City. The City uses a prescribed formula included in the Quimby Ordinance to determine how much parkland must be provided by proposed developments to meet demand generated by new residents. This formula multiplies the number of proposed housing units by specified factors (0.0149 for single-family [low-density] and medium-density housing and 0.0088 for high-density housing). The proposed project would have 671 low-density, 2,215 medium-density, and 587 high-density housing units. Therefore, based on application of the City's formula to the proposed project, to meet the City's Quimby Act standards for parkland dedication, the proposed development would be required to provide approximately 48.2 net acres of parkland.

Under the proposed project, there would be approximately 48.4 acres (net) of neighborhood and community parks. Therefore, the proposed project would slightly exceed the City's parkland dedication requirement of 48.2 acres. Because part of the proposed project would be located within an airport safety zone and the Sacramento International Airport Comprehensive Land Use Plan (CLUP) prohibits lighted parks and community parks in airport safety zones, the proposed project would not include community parks within the airport safety zone. The proposed 23-acre community park would be located in the northeastern portion of the site outside the airport safety zone and, therefore, could include facilities such as large picnic areas, on-site parking, lighted sport courts/fields, and a dog park. The CLUP also places restrictions on the types of amenities that can be provide at facilities within airport safety zones. As a result park and recreational facilities that are located in the western portion of the project site in the airport safety zone would not include facilities would help park in airport safety zones. The proposed project would are located in the western portion of the project site in the airport safety zone would not include facilities within airport safety zones. As a result park and recreational facilities that are located in the western portion of the project site in the airport safety zone would not include facilities would likely include amenities such as tot lots, benches, trails, community gardens, and fountains.

The City General Plan and City Parks and Recreation Master Plan include parkland acreage service level goals of 2.5 acres of neighborhood parks and 2.5 acres of community parks per 1,000 City residents, and 8 acres of citywide/regionally serving park acres per 1,000 City residents. As described above in Sections 6.6.2, "Environmental Setting," and Section 6.6.3, "Regulatory Setting," the City is currently meeting these parkland acreage goals. Because the

proposed project would meet the City's parkland dedication requirement under the Quimby Ordinance as described above, the project would not exacerbate the City's parkland deficit and therefore would not result in substantial physical deterioration of existing facilities. Furthermore, the parkland acreage Service Level Goals in the City Parks and Recreation Master Plan are considered goals and not minimum standards; their application should allow for flexibility as areas change or the needs of the residents change, and should be related to economic feasibility and the nature of the community or neighborhood (City of Sacramento 2004a).

It should be noted that the project could receive a credit towards its required 48.2-net-acre land dedication requirement for privately owned and maintained open space or local recreation facilities because the project includes certain facilities that qualify for credits under the Quimby ordinance. These facilities include recreational swimming areas, recreation buildings, and other special areas (e.g., accessible lake/detention basin) each of which would qualify for up to 5% (2.4 acres) credit toward its land dedication requirement for a total credit of 15% or 7.2 acres. As such, the total park land acreage provided at the site could be reduced by 7.2 acres subject to the City's approval. Regardless, the project would continue to meet its Quimby Act requirements either through land dedication for park facilities, in lieu fees paid by the applicant, and/or with private facility credits for applicable facilities.

For the reasons described above, the proposed project would not increase demand for existing facilities such that the substantial physical deterioration of existing facilities would result. This impact would be *less than significant*.

No mitigation is required.

IMPACT 6.6-2

Substantial Loss of Open Space Resources. *The proposed project would result in the conversion of approximately 577 acres of agricultural land to nonagricultural use in an area that already is experiencing substantial development and loss of open space. The conversion of agricultural land to urban development would result in the permanent loss of open space resources. This impact would be significant.*

Agricultural lands within the North Natomas area are part of an assortment of other open space areas within Sacramento County. Sacramento County has been among the top 10 urbanizing counties in California and in the top ranks for net loss of irrigated land as mapped between 1988 and 2002 by the FMMP of the California Department of Conservation's Division of Land Resource Protection (California Department of Conservation 2005). The project site is within a portion of the county that historically has been devoted to agriculture, but rapid urban development is replacing much of this open space. As of December 2004, approximately 12% of the existing land in the City's Policy Area (approximately 12,946 acres) was in agricultural use, with a large portion of the existing agricultural land located in North Natomas (City of Sacramento 2005). The proposed project would result in the direct conversion of approximately 577 acres (gross) of agricultural land to nonagricultural use and urban development in an area that already is experiencing substantial development and loss of open space. Total open space land converted would actually be somewhat reduced through the provision of on-site open space features (e.g., open space corridors, lake/detention basins). The NNJV MOU requires that future development projects preserve permanent open space in the Natomas area through conservation easements at a 1:1 mitigation ratio (comprised of half-to-one ratio for habitat and half-to-one for open space). Because the project would result in the permanent conversion of open space resources and no conservation easements are proposed as an element of the project, the loss of open space would be a *significant* impact.

Mitigation Measure 6.6-2: (City of Sacramento and LAFCo)

a. Consistent with the principles of the City/County Joint Vision Plan, the project applicant shall coordinate with the City to identify appropriate lands to be set aside in a permanent conservation easements at a ratio of one open space acre converted to urban land uses to one-half open space acre preserved and at a ratio of one habitat acre converted to urban land uses to one-half habitat acre preserved. The total acres of land conserved shall be based on final site maps indicating the total on-site open space and habitat converted. Conserved open space and habitat areas could include areas on the project site, lands secured for permanent habitat enhancement (e.g., giant garter snake, Swainson's hawk habitat), or additional land identified by applicant in consultation with the City. All conserved open space and habitat land shall be located in the NNJV area. Should the City and County change adopted mitigation ratios before issuance of any grading permits, the project applicant shall comply with the revised policy.

LAFCo

Prior to annexation, the city shall implement mitigation measure 6.6-2.

Significance After Mitigation

As described for Mitigation Measure 6.6-2, implementation of mitigation requiring preservation of open space and habitat land would substantially lessen significant impacts associated with the conversion of open space on the project site because conservation easements would assist the public and private sectors in protecting other open space from the pressures of development. However, preservation of existing open space resources would only partially offset conversions of open space associated with project impacts, no new open space would be made available.

For these reasons, and because no other feasible mitigation is available to reduce the impact associated with loss of open space in North Natomas, the project's impacts to open space resources would remain *significant and unavoidable* after mitigation.