

IV. Environmental Impact Analysis

J. Public Services

1. Fire Protection

1. Introduction

This subsection describes the potential impacts of the Project on fire protection services in the Project area. The analysis includes a description of the existing fire protection facilities in the Project area. The analysis uses the following factors from the Los Angeles Fire Department (LAFD) to assess potential demands on fire protection and emergency medical services: fire flow requirements, response distances, and emergency access. This section uses information from the following resources: the LAFD website, the Fire Code chapter of the Los Angeles Municipal Code (LAMC), the Los Angeles General Plan Framework Element, Los Angeles General Plan Safety Element, and written correspondence with Kristin Crowley, Fire Marshal, Bureau of Fire Prevention and Public Safety of the LAFD, attached as **Appendix K** of this Draft EIR.

2. Environmental Setting

a) Regulatory Framework

(1) Federal

(a) Occupational Safety and Health Administration

The Federal and California State Occupational Safety and Health Administrations enforce the provisions of the Federal and State Occupational Safety and Health Acts, which collectively require safety and health regulations for construction under Part 1926 of Title 29 Code of Federal Regulations. The fire-related requirements of the Occupational Safety and Health Administration (OSHA) are specifically contained in Subpart F, Fire Protection and Prevention, of Part 1926. Examples of general requirements related to fire protection and prevention include maintaining fire suppression equipment specific to construction on-site; providing a temporary or permanent water supply of sufficient volume, duration, and pressure; properly operating the on-site fire-fighting equipment; and keeping storage sites free from accumulation of unnecessary combustible materials.

(2) State

(a) *California Building Code and California Fire Code*

The California Building Code (California Code of Regulations, Title 24, Part 2) is a compilation of building standards, including fire safety standards for new buildings, which are also provided in the California Fire Code (California Code of Regulations, Title 24, Part 9). California Building Code standards are based on building standards that have been adopted by state agencies without change from a national model code; building standards based on a national model code that have been changed to address particular California conditions; and building standards authorized by the California legislature but not covered by the national model code. The 2019 edition of the California Building Code became effective on January 1, 2020.¹ The building standards in the California Building Code apply to all locations in California, except where more stringent standards have been adopted by state agencies and local governing bodies. The 2016 California Fire Code also went into effect on January 1, 2017.² Typical fire safety requirements of the California Fire Code include: the installation of fire sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures within wildfire hazard areas. Specific California Fire Code fire safety regulations have been incorporated by reference in the LAMC with local amendments, as discussed below.

(b) *Occupational Safety and Health Administration*

The California Department of Industrial Relations, Division of Occupational Safety and Health (Cal-OSHA) provides details on fire protection and prevention (Title 8, Division 1, Subchapter 4 (Construction Safety Orders), Article 36 (Fire Protection and Prevention)) for construction safety. A general requirement is that the employer shall be responsible for the development of a fire protection program to be followed throughout all phases of the construction work.

(c) *Mutual Aid Plan*

The LAFD participates in the California Fire Service and Rescue Emergency Mutual Aid System, as managed by the Governor's Office of Emergency Services (OES). The OES Mutual Aid Plan outlines procedures for establishing mutual aid agreements at the local, operational, regional, and state levels, and divides the State into six mutual aid regions to facilitate the coordination of mutual aid. The Fire Department is located in Region I (San Luis Obispo, Santa Barbara, Ventura, Los Angeles, and Orange counties). Through

¹ *California Building Code, (California Code of Regulations, Title 24, Part 2).*

² *California Fire Code, (California Code of Regulations, Title 24, Part 9)*

the Emergency Mutual Aid system, the OES is informed of conditions in each geographic and organizational area of the State, and the occurrence or imminent threat of disaster. All OES Mutual Aid participants monitor a dedicated radio frequency for fire events that are beyond the capabilities of the responding fire department and provide aid in accordance with the management direction of the OES.³

The Mutual Aid Plan is based on the concept of "self-help" and "mutual aid." The State of California, all 58 counties and nearly all city governments, including the City of Los Angeles, are signatory to a Master Mutual Aid Agreement. The State is divided into six mutual aid regions to facilitate the coordination of mutual aid and other emergency operations. It is in the best interest of local government agencies to cooperate to achieve objectives of common interest. The LAFD has long recognized the concept of a functionally integrated fire protection system, involving federal, state, and local government resources, as the most effective method of delivering fire protection where life, property, and natural resources values are at risk.⁴

(d) *California Constitution Article XIII, Section 35*

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.⁵

³ *California Emergency Management Agency, Mutual Aid Plan.*

⁴ *LAFD, Mutual Aid.*

⁵ *City of Hayward v. Board Trustee of California State University* (2015) 242 Cal. App. 4th 833, 847.

(3) Local

(a) *City of Los Angeles Charter*

Section 520 of the Los Angeles City Charter states that the LAFD's duty is to control and extinguish injurious or dangerous fires and to remove that which is liable to cause those fires. It also requires the LAFD to enforce all ordinances and laws relating to the prevention or spread of fires, fire control, and fire hazards within the City, as well as to conduct fire investigations and protect lives and property in case of disaster or public calamity.⁶

(b) *Los Angeles General Plan Framework Element*

The General Plan Framework Element (Framework Element) was adopted by the City Council on December 11, 1996, and readopted in August 2001. The Framework Element sets forth general guidance regarding land use issues for the entire City of Los Angeles (City) and defines citywide goals, objectives, and policies in nine chapters including land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the Framework Element establishes goals, objectives, and policies for the provision of infrastructure and public services within the City. The Framework also outlines the necessary actions that the City must implement to ensure public services and infrastructure to remain viable, sustainable, and able to support the needs of a growing population and economy. The primary goal of the Framework regarding fire services states:

- **Goal 9J:** Every neighborhood has the necessary level of fire protection services, EMS and infrastructure.

Chapter 9 further establishes four objectives for the provision of fire services within the City to ensure that Goal 9J is met. These objectives are as follows:

- **Objective 9.16:** Monitor and forecast demand for existing and projected fire facilities and services.
- **Objective 9.17:** Assure that all areas of the City have the highest level of fire protection and EMS, at the lowest possible cost, to meet existing and future demand.
- **Objective 9.18:** Phase the development of new fire facilities with growth.
- **Objective 9.19:** Maintain the LAFD's ability to assure public safety in emergency situations.

⁶ See also, *Los Angeles Administrative Code Sections 22.62 et. seq.*

The objectives listed above provide the basis for nine corresponding policies related to fire services under Goal 9J of the Framework. Of the nine policies, those relevant to this analysis are the following:

- **Policy 9.16.1:** Collect appropriate fire and population development statistics for the purpose of evaluating fire services needs based on existing and future conditions.
- **Policy 9.17.4:** Consider the Fire Department's concerns and, where feasible adhere to them, regarding the quality of the area's fire protection and EMS when developing general plan amendments and zone changes or considering discretionary land use permits.

(c) *Los Angeles General Plan Safety Element*

The City Council adopted the Safety Element of the General Plan (Safety Element) on November 26, 1996. The Safety Element, relative to the provision of fire services, outlines a history of fire rescue and the establishment of the Fire Department within the City. Furthermore, the Safety Element establishes goals and policies regarding emergency response time and minimum standards for LAFD facilities. Specifically, Policy 2.1.6 (Standards/Fire) requires the LAFD to "continue to maintain, enforce and upgrade requirements, procedures and standards to facilitate more effective fire suppression." Policy 2.1.6 is implemented through the components, requirements, and standards of the LAMC's Fire Code, which are discussed in detail below, such as peak load water requirements, and other standard code requirements including road widths, access, clearances around structures, and other standards or procedures relative to fire suppression. Additionally, Policy 2.1.6 forms the basis for the LAMC requirements regulating the minimum standards for the location and expansion of fire facilities based upon fire flow requirements, intensity and type of land use, life hazard, occupancy, and degree of hazard so as to provide adequate fire and emergency medical response within the City.

(d) *Central City North Community Plan*

As previously discussed, in **Section IV.D, Land Use and Planning**, of this Draft EIR, the Project Site is located within the boundary of the Central City North Community Plan. The Central City North Community Plan contains the following fire protection objective and policies applicable to the Project in Chapter III, Land Use Policies and Programs, Fire Protection⁷:

Objective 9-1: Ensure that fire facilities and fire protection services are sufficient for the existing and future population and land uses of Central City North.

⁷ *Los Angeles City Department of Planning, Central City North Community Plan.*

Policy 9-1.1: Coordinate with the Fire Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demand.

(e) *Los Angeles Municipal Code*

Chapter V, Public Safety and Protection, Article 7 of the LAMC establishes the Fire Protection and Prevention Code for the City of Los Angeles (Fire Code). Article 7 consists of 141 Divisions that govern and concern fire protection and prevention. According to Article 7, its purpose is to “prescribe laws for the safeguarding of life and property from fire explosion, panic, or other hazardous conditions which may arise in the use or occupancy of buildings, structures, or premises; and to prescribe such other laws as it may be the duty of the Fire Department to enforce.” Specifically, Division 9 establishes access, hydrant and fire flow requirements; and Division 118 outlines standards and requirements for new high-rise buildings and incorporates State of California Title 24 requirements. All construction within the City must comply with the applicable divisions within Chapter V, Article 7 of the LAMC.

Division 118 is comprised of 12 sections that include the following standards and requirements: fire control room requirements; building communication requirements; LAFD communication systems; elevator system requirements; fire protective signaling systems; emergency smoke control systems; standby and emergency power systems; stair shaft doors; pressurized shaft doors; automatic sprinkler systems and emergency helicopter landing facilities.

Specifically, LAMC Section 57.106.5.2 provides that the Fire Chief shall have the authority to require drawings, plans, or sketches as may be necessary to identify: (1) occupancy access points; (2) devices and systems; (3) utility controls; (4) stairwells; and (5) hazardous materials/waste. In addition, LAMC Section 57.107.7 requires that the installation, alteration, and major repair of the following be performed under permit of the Department of Building and Safety: Fire Department communication systems, building communication systems, automatic elevators, heliports, emergency power systems, fire escapes, private fire hydrants, fire assemblies, fire protective signaling systems, pilot lights and warning lights for heat-producing equipment, refrigerant discharge systems, smoke detectors, emergency smoke control systems, automatic sprinkler systems, standpipe systems, and gas detection systems. Furthermore, LAMC Section 57.118 establishes LAFD’s fire/life safety plan review and LAFD’s fire/life safety inspection for new construction projects. The Project will comply with these requirements of the Fire Code, as applicable.

LAMC Section 57.512.1 provides that response distances, which are based on land use and fire flow requirements, shall comply with Table 57.507.3.3 of the LAMC. Based on such requirements, the maximum response distance for the Industrial and Commercial

land use category (which the LAFD has determined is the appropriate land use classification for the Project⁸) from fire stations with an engine company is 1.0 mile, and the maximum response distance from fire stations with a truck company is 1.5 miles. Where a response distance is greater than that which is allowable, all structures must be constructed with automatic fire sprinkler systems.

The Fire Code also addresses access, water flow requirements, and hydrants. Specifically, LAMC Section 57.503.1.4 requires the provision of an approved, posted fire lane whenever any portion of an exterior wall is more than 150 feet from the edge of a roadway, while LAMC Section 57.507.3.1 establishes fire water flow standards. Fire water flow requirements, as determined by the LAFD, vary by project site as they are dependent on land use (e.g., higher intensity land uses require higher flow from a greater number of hydrants), life hazard, occupancy, and fire hazard level. As set forth in LAMC Section 57.507.3.1, fire water flow requirements vary from 2,000 gallons per minute (gpm) in the Low Density Residential land use category to 12,000 gpm in the High Density Industrial and Commercial land use category (land uses in the Industrial and Commercial category require 6,000 to 9,000 gpm, flowing from four to six hydrants). A minimum residual water pressure of 20 pounds per square inch (psi) is to remain in the water system with the required gpm flowing.

LAMC Section 57.507.3.2 addresses land use-based requirements for fire hydrant spacing and type. Land uses in the Industrial and Commercial category require one hydrant per 80,000 square feet of land with 300-foot distances between 2.5-inch by 4-inch or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant.

Furthermore, LAMC Section 57.4705.4 and LAFD Requirement No. 10 require high-rise buildings to provide either an Emergency Helicopter Landing Facility (EHLF), Helicopter Tactical Landing Area (HLTA), or additional life safety features required by the LAFD in lieu of helicopter landing facilities.

In addition, projects are required to comply with all state and local building codes relative to fire protection, safety, and suppression. Specifically, these standards and requirements are set forth by the State's Title 24 regulations, the Safety Element, the Fire Code, and any additional requirements established by the LAFD relative to fire prevention, safety, suppression, and emergency access and response. Additionally, projects are required to submit a plot plan for approval of access and hydrants by the LAFD prior to the issuance of a building permit by the City. The plot plan shall include

⁸ LAFD, Written correspondence with Kristin Crowley, Fire Marshall, LAFD July 3, 2018. Refer to **Appendix K** of this Draft EIR.

fire prevention and access features to the satisfaction of the LAFD, including the following standard requirements:

- Access for Fire Department apparatus and personnel to and into all structures shall be required.
- Any required Fire Annunciator panel or Fire Control Room shall be located within 50 feet visual line of sight of the main entrance stairwell or to the satisfaction of the LAFD.
- Any required fire hydrants to be installed shall be fully operational and accepted by the LAFD prior to any building occupation.
- All water systems and roadways are to be improved to the satisfaction of the LAFD prior to any building occupation.
- Sprinkler systems shall be required throughout any structure to be built pursuant to Fire Code Section 903.3.1
- No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
- No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along the path of travel.

(f) 2018-2020 Strategic Plan

The LAFD provides fire prevention, fire suppression, and life safety services in the City. The LAFD's 2018-2020 Strategic Plan, A SAFER CITY 2.0, outlines five goals to guide the LAFD to:

- 1) Provide Exceptional Public Safety and Emergency Service;
- 2) Embrace a Healthy, Safe and Productive Work Environment;
- 3) Capitalize on Advanced Technology;
- 4) Enhance LAFD Sustainability & Community Resiliency; and
- 5) Increase Opportunities for Personal Growth and Professional Development.

The 2018-2020 Strategic Plan is intended to promote fire prevention by maximizing fire safety education and minimizing loss of life through fire prevention programs. To date LAFD has been able to completely over 70 percent of the plan through completion of specific goals and objectives.⁹

⁹ *LAFD 2018-2020 Strategic Plan.*

b) Existing Conditions

(1) Fire Protection Facilities

Fire prevention, fire suppression, and life safety services in the City are provided by the LAFD. The LAFD has 3,246 uniformed personnel and 353 non-uniformed professional support staff.¹⁰ Services of the LAFD include fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service. As of June 2020, a professionally trained staff of 1,018 firefighters are on duty at all times at 106 neighborhood fire stations located across the LAFD's 469 square-mile jurisdiction.¹¹

The Project Site is located within LAFD's Central Bureau which is broken down into three battalions: Battalions 1, 2, and 11.¹² There are five LAFD fire stations located within a 2-mile radius of the Project Site as shown in **Figure IV.J.1-1, Fire Station Location Map**. **Table IV.J.1-1** presents the Fire Stations, distance to Project Site, staffing levels and apparatus.

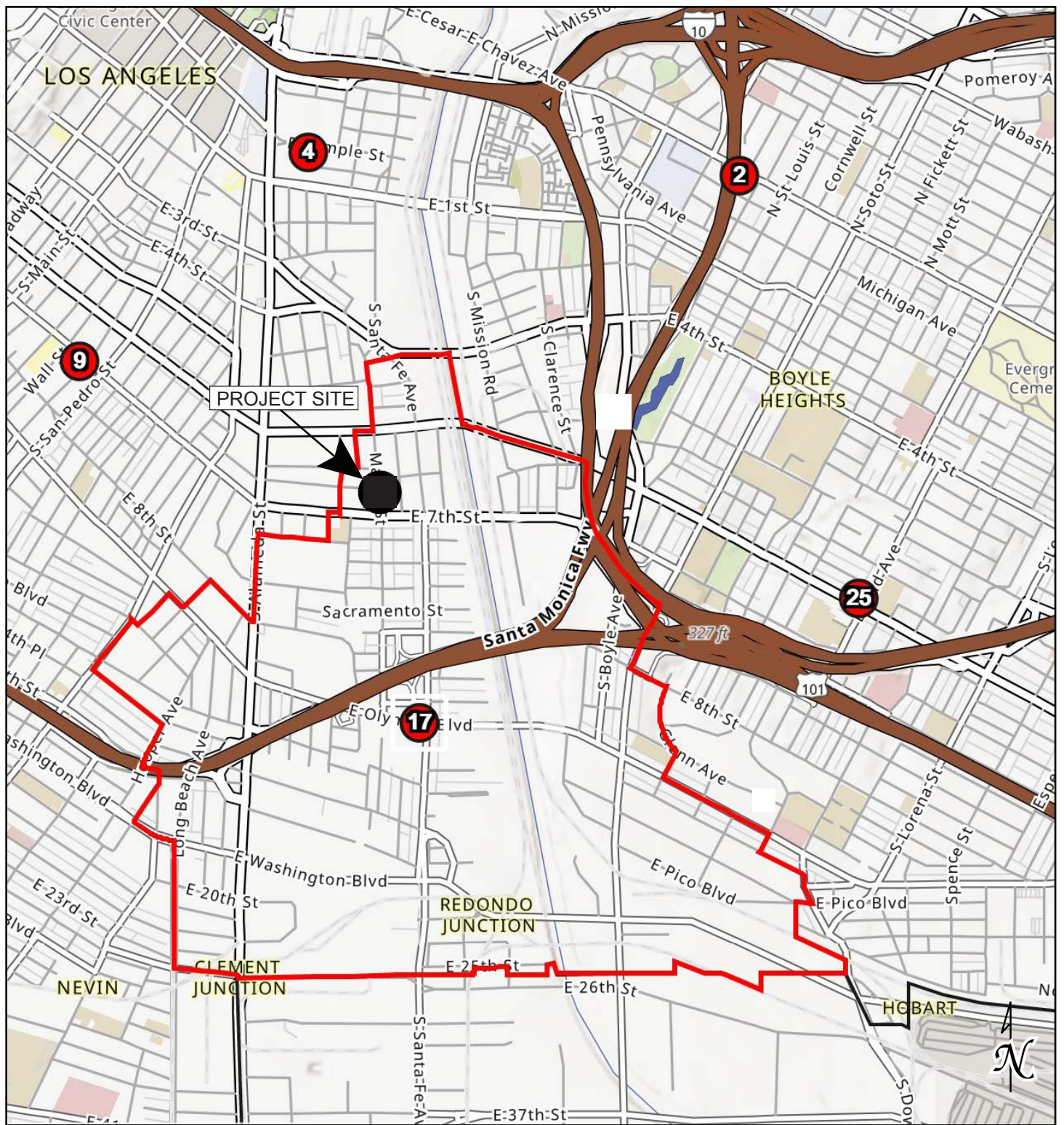
Table IV.J.1-1
Fire Stations Serving the Project Site

Fire Station and Address	Distance to Project Site (miles)	Staff	Equipment & Services
Fire Station No. 17 1601 S. Santa Fe Ave., LA 90021	0.8	8	Engine, Paramedic Rescue Ambulance, Foam Tender, Haz-Mat Tender and Arson Investigation Unit
Fire Station No. 9 430 E. 7 th Street, LA 90014	1.1	12	Assessment Engine, Assessment Truck and BLS Rescue Ambulance
Fire Station No. 4 450 E. Temple Street, LA 90012	1.3	9	Assessment Engine, Paramedic Rescue Ambulance, EMS Battalion Captain and BLS Rescue Ambulance
Fire Station No. 25 2927 Whittier Blvd, LA 90023	1.7	6	Assessment Engine and Paramedic Rescue Ambulance
Fire Station No. 2 1962 Cesar Chavez Ave, LA 90033	1.8	12	Light Force, Engine, Truck, Paramedic Rescue Ambulance
<i>Source: LAFD, Written correspondence with Kristin Crowley, Fire Marshall, LAFD July 3, 2018.</i>			

¹⁰ Los Angeles Fire Department, *Our Mission, Organization*.

¹¹ Los Angeles Fire Department, *Our Mission*.

¹² Los Angeles Fire Department, *Our Mission*.



Fire Station No. 17: 1601 S. Santa Fe Avenue
 Fire Station No. 9: 430 E. 7th Street
 Fire Station No. 4: 450 E. Temple Street
 Fire Station No. 25: 2927 Whittier Boulevard
 Fire Station No. 2: 1962 Cesar Chavez Avenue

Source: Los Angeles Fire Department, August 2018.

Figure IV.J.1-1
 Fire Station Location Map

The primary station serving the Project Site is Fire Station No. 17 located at 1601 Santa Fe Avenue, approximately 0.8 miles south of the Project Site. Fire Station No. 17 has eight members and the apparatus and services they provide include an engine company, paramedic rescue ambulance, foam tender, haz-mat tender and arson investigation unit. This station is located within the maximum one-mile distance from the Project Site for an engine company.¹³ The secondary stations that could respond to the Project Site are Station No. 9 and Station No. 4, both located within the 1.5-mile maximum distance for a truck company.

Fire Station No. 9 is located at 430 E. 7th Street, approximately 1.1 miles west of the Project Site and has 12 members, an engine, truck, and basic life support ambulance (BLS). Fire Station No. 4, located at 450 E. Temple Street is 1.3 miles north of the Project Site has nine members and houses an assessment engine, paramedic rescue ambulance, EMS Battalion Captain and BLS rescue ambulance.¹⁴ Fire Station No. 25 and Fire Station No. 2 would also provide backup and are within two-miles of the Project Site, but beyond the 1.5-mile maximum distance. Fire Station No. 25 is located at 2927 Whittier Boulevard, approximately 1.7 miles east of the Project Site, and staffed by six members with an assessment engine and paramedic rescue ambulance. Fire Station No. 2 is located at 1962 Cesar Chavez Boulevard, approximately 1.8 miles northeast of the Project Site. There are twelve members and a light force, engine and paramedic rescue ambulance.¹⁵

The Safety Element designates specific arterials as selected disaster routes. Disaster routes are freeway, highway or arterial routes pre-identified for use during times of crisis. These routes are utilized to bring in emergency personnel, equipment, and supplies to impacted areas in order to save lives, protect property and minimize impact to the environment. The nearest selected disaster route to the Project Site is Alameda Street, located 0.4 mile west of the Project Site.¹⁶

(2) Response Distance and Times

The Fire Code specifies maximum response distances allowed between specific locations and engine/truck companies, based on land uses and fire flow requirements. As previously identified, pursuant to LAMC Section 57.507.3.3, the maximum response distance between Industrial and Commercial land uses (as the LAFD has classified the

¹³ Written correspondence with Kristin Crowley, Fire Marshal, Los Angeles Fire Department, dated July 3, 2018, **Appendix K** of this Draft EIR.

¹⁴ Written correspondence with Kristin Crowley, Fire Marshal, Los Angeles Fire Department, dated July 3, 2018, **Appendix K** of this Draft EIR.

¹⁵ Written correspondence with Kristin Crowley, Fire Marshal, Los Angeles Fire Department, dated July 3, 2018, **Appendix K** of this Draft EIR.

¹⁶ Los Angeles City Department of Planning, Safety Element, Exhibit H, December 1990.

Project's mix of uses) to a fire station that houses an engine company is one-mile, and the maximum response distance to a fire station that houses a truck company is 1.5 miles (both the engine and truck company requirements apply to the Project).¹⁷ The Project Site is within an approximately 0.8-mile response distance of Fire Station No. 17, which houses an engine company and is within approximately 1.1 miles from Fire Station No. 9 which houses both a truck and engine company.

Based on the criteria of response distance from existing fire stations, the LAFD has determined that fire protection would be adequate. Currently, there are no immediate plans to increase LAFD staffing or resources within the existing fire stations, which will serve the Project Site.¹⁸

Response time relates directly to the physical linear travel distance (i.e., the number of miles between a fire station and a specific location) and the LAFD's ability to successfully navigate the given roadway network. Response times are measured from the time the dispatcher receives a call for service to the time the LAFD arrives at the site. Thus, roadway congestion, intersection level of service, weather conditions, and construction traffic along the response route can affect the response time.

The LAFD created FireStatLA in 2014 to track and evaluate data in order to improve response times citywide. FireStatLA is aimed at increasing accountability, improving decision making and better allocating resources, with the primary goal of improving response times to better fulfill the mission of saving lives and protecting property.¹⁹ The data includes information on turnout time, travel time and number of incidences. Based on response metrics from January through April 2020, Fire Station No. 17 had an average response time for non-EMS calls of 6:00 minutes, 6:39 minutes for EMS calls and 5:07 minutes for structure fires.²⁰ Based on response metrics from January through April 2020, Fire Station No. 9 had an average response time for non-EMS calls of 5:30 minutes, 5:57 minutes for EMS calls and 4:41 minutes for structure fires.²¹ Based on response metrics from January through April 2020, Fire Station No. 4 had an average response time for non-EMS calls of 5:50 minutes, 6:23 minutes for EMS calls and 4:57 minutes for structure fires.²² Under national standards set forth by the National Fire Protection Association, which have been adopted by LAFD, the response time goal is six minutes to nearly all medical emergencies. The response times for Fire Stations No. 17, 9 and 4 are in

¹⁷ Pursuant to LAMC Section 57.507.3.3, the maximum response distances for both LAFD fire suppression companies (engine and truck) must be satisfied.

¹⁸ Pursuant to LAMC Section 57.507.3.3, the maximum response distances for both LAFD fire suppression companies (engine and truck) must be satisfied.

¹⁹ LAFD FireStatLA.

²⁰ LAFD FireStatLA.

²¹ LAFD FireStatLA.

²² LAFD FireStatLA.

accordance with and below these national standards, and similar to or below the Citywide average of 6:15 minutes for non-EMS calls, 6:42 minutes for EMS calls and 4:59 minutes for structure fires.²³

However, LAFD has not established response time standards for emergency response, nor adopted the National Fire Protection Association (NFPA) standard of 5 minutes for EMS response and 5 minutes, 20 seconds for fire suppression response.²⁴ Roadway congestion, road access, weather conditions, and construction traffic along a response route can affect response time. Generally, multi-lane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of a path of an emergency vehicle. Additionally, the LAFD, in collaboration with Los Angeles Department of Transportation (LADOT), has developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response.²⁵ The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS.²⁶

According to the LAFD, although response time and number of emergency medical services (EMS) or fire-related incidents is considered to assess the adequacy of fire protection services, it is one factor among several that LAFD utilizes. The LAFD utilizes several factors in considering its ability to respond to fires and life and health safety emergencies, including required fire flow, response distance from existing fire stations, and the LAFD's judgement for needs in an area. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment, and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. In conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board Trustee of California State University* (2015) ruling, the City has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection and emergency medical services.

(3) Fire Flow

The City of Los Angeles Department of Water and Power (LADWP) currently provides water for fire flow to the Project Site. Fire flows are supplied by the same water mains as the domestic water systems including the lines in local streets and major roadways. In general, fire flow requirements are closely related to land use as the quantity of water

²³ LAFD FireStatLA.

²⁴ NFPA, NFPA 1710 – *Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments*, 2016 Edition. Response time is turnout time plus travel time for EMS and fire suppression incidents.

²⁵ LADOT, *Los Angeles Signal Synchronization Fact Sheet*, accessed June 3, 2018.

²⁶ LAFD, *Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles*, Bulletin No. 133, October 2008.

necessary for fire protection varies with the type of development, life hazard, type and level of occupancy, and degree of fire hazard (based on such factors as building age or type of construction). City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In all cases, a minimum residual water pressure of 20 pounds per square inch (PSI) is to remain in the water system while the required gpm of water is flowing.²⁷ It has determined that the required fire-flow for the Project has been set at 6,000 to 9,000 gpm from four to six fire hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch. This translates to a required flow of 1,500 gpm for each hydrant.²⁸ An Information of Fire Flow Availability Request (IFFAR) was submitted to LADWP regarding available fire hydrant flow to demonstrate compliance. The completed IFFAR shows six nearby hydrants flowing simultaneously for a combined 9,000 gpm at 20 psi. As shown by the IFFAR, the Project Site has adequate fire flow available to demonstrate compliance with Section 57.507.3 of the LAMC.²⁹

As previously identified, pursuant to LAMC Section 57.507.3.2 hydrants in high-density industrial and commercial locations, such as the Project Site, must serve a net land area of 80,000 square feet. Additionally, there must be a distance of 300 feet between hydrants on roads and fire lanes and 2.5-inch by 4.0-inch double fire hydrants must be used. The Project Site is less than 80,000 square feet and there is one hydrant at the southwest corner of Mateo Street and Industrial Street, across the street from the Project Site. There are multiple hydrants in this area including one at the northwest corner of Jesse Street and Imperial Street, one at the northwest corner of Mateo Street and Jesse Street, one at each corner of Mateo Street and 7th Street and Imperial Street and 7th Street and several others within both the immediate and greater vicinity of the Project Site.³⁰ The hydrants currently serving the Project Site comply with LAMC Section 57.507.3.2.

3. Project Impacts

a) Thresholds of Significance

In accordance with guidance provided in Appendix G to the *State CEQA Guidelines*, the Project could have a significant impact if it were to:

a) *Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need*

²⁷ LAFD, Written correspondence with Kristin Crowley, Fire Marshall, LAFD July 3, 2018. Refer to **Appendix K** of this Draft EIR.

²⁸ LAFD, Written correspondence with Kristin Crowley, Fire Marshall, LAFD July 3, 2018. Refer to **Appendix K** of this Draft EIR.

²⁹ 676 Mateo Street Mixed-Use Project Utility Infrastructure Technical Report: Water, Exhibit 1, prepared by KPFF, December 10, 2018.

³⁰ City of Los Angeles Geo Hub, fire hydrant locations.

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 fire protection.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

The *L.A. CEQA Thresholds Guide* identifies the following criterion to evaluate fire protection impacts:

- *Require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service.*

b) Methodology

In accordance with standard LAFD methodology, adequate fire protection is determined based on the required fire flows for the land uses proposed, distance to the nearest fire station for the land uses proposed, hydrant and access improvements, and review by the LAFD of a project's emergency features, to determine if the Project would require additional equipment, personnel, new facilities, or alterations to existing facilities. As previously mentioned, the LAFD does not solely determine the adequacy of fire protection based upon on response times or number of emergency medical services (EMS) or fire-related incidents. Beyond the standards included in the Fire Code, consideration is given to the size of the Project, uses proposed, fire-flow necessary to accommodate the Project, response time, distance for engine and truck companies (the distance criteria is one mile for an engine company and 1.5 miles for a truck company), fire hydrant sizing and placement standards, access, and the Project's potential to use or store hazardous materials. Based on these factors, a determination is made as to whether the LAFD would require a new or physically altered facility to maintain acceptable service ratios the construction of which could result in a potentially significant environmental impact.

It is important to note that consistent with *City of Hayward v. Trustees of the California State University* (2015) 242 Cal.App.4th 833, significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on public safety services are not an environmental impact that CEQA requires a project applicant to mitigate: "[T]he obligation to provide adequate fire and emergency medical services is the responsibility of the city. (Cal. Const., art. XIII, § 35, subd. (a)(2) [“The protection of the public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services.”].) Thus, the need for additional fire protection services is not an environmental impact that CEQA requires a project proponent to mitigate.

Therefore, the need for, or deficiency in, adequate fire protection and emergency medical services in and of itself is not a CEQA impact, but rather a social and/or economic impact.³¹ Where a project causes a need for additional fire protection and emergency medical services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in this EIR. The ultimate determination of whether there is a significant impact to the environment related to fire protection and emergency medical services from a project is determined by whether construction of new or expanded fire protection and emergency medical facilities is a reasonably foreseeable direct or indirect effect of the project.

There are no current capital improvement plans for the construction or expansion of fire facilities in the impact area. Therefore, the City makes the following assumptions based on existing zoning standards and based on historical development of fire and emergency facilities, that in the event the City determines that expanded or new emergency facilities are warranted, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under *State CEQA Guidelines* Section 15301 or 15332.

c) Project Design Features

The Project would comply with all applicable regulatory standards pertaining to fire prevention and life safety. In particular, the Project would comply with LAMC fire safety requirements, including those established in the Building Code (Chapter 9) and the Fire Code (Chapter 7); and Table 57.507.3.1 of the LAMC regarding fire flow requirements. No specific project design features are proposed with regard to fire protection.

As discussed, in **Section IV.K, Transportation**, of this Draft EIR, pursuant to PDF TR-1, the Project Applicant would implement a Construction Management Plan that would include provisions for maintaining safety and access to the Project Site during construction.

d) Analysis of Project Impacts

As compared to the Project, the Increased Commercial Flexibility (Flexibility Option) would change the use of the second floor from residential to commercial, and would not otherwise change the Project's land uses or size. The overall commercial square footage provided would be increased by 22,493 square feet to 45,873 square feet and, in turn, there would be a reduction in the number of live/work units from 185 to 159 units and an

³¹ *City of Hayward v. Board Trustee of California State University* (2015) 242 Cal. App. 4th 833, 847.

increase in the number of bicycle spaces from 154 to 161. The overall building parameters would remain unchanged and the design, configuration, and operation of the Flexibility Option would be comparable to the Project. In the analysis of Project impacts presented below, where similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option would be essentially the same, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option.

Threshold a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?

Due to the similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option, substantial adverse physical impacts associated with the provision of new or physically altered fire facilities would be essentially the same. Therefore, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option.

(1) Impact Analysis

(a) Construction

Construction on the Project Site would increase the potential for accidental fires from such sources as mechanical equipment and flammable construction materials. As previously shown in **Table IV.J.1-1**, the Project Site is expected to continue to be served by Fire Station Nos. 17 (located 0.8 mile from the Project Site), 9 (located 1.1 miles from the Project Site) and 4 (located 1.3 miles from the Project Site). In addition, Fire Station No. 2 and Fire Station No. 25 would continue to be available to serve the Project Site as necessary.

The implementation of “good housekeeping” procedures by the construction contractors and the work crews would minimize these hazards. The transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities. The Project would be required to implement standard best management practices (BMPs) set forth by the City and the RWQCB, which would ensure that wastes generated during the construction process are disposed of properly. Construction activities also have the potential to affect

fire protection services, such as emergency vehicle response, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. These impacts are considered to be less than significant for the following reasons:

- Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAFD (see PDF TR-1 in **Section IV.K, Transportation** of this Draft EIR);
- Partial lane closures, if determined to be necessary, would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until construction is complete (see PDF TR-1 in **Section IV.K, Transportation** of this Draft EIR); and
- The Project would be required to prepare a Construction Management Plan (see PDF TR-1 in **Section IV.K, Transportation** of this Draft EIR) that would address traffic and access control during construction.

Overall, upon implementation of the Project Design Feature, construction-related impacts would be minimized. PDF TR-1 would lessen the potential impacts to LAFD during construction and construction would not generate a demand for additional fire protection services that would substantially exceed the capability of the LAFD to serve the Project Site. The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds.³² Moreover, construction impacts are temporary in nature and do not cause lasting effects to impact LAFD fire protection services. **Project construction would not necessitate the provision of new or physically altered government facilities in order to maintain the LAFD's capability to serve the Project Site; accordingly, the Project and Flexibility Option would not result in adverse physical impacts associated with the construction of new or altered facilities. Therefore, impacts on fire protection services during Project and Flexibility Option construction would be less than significant; no mitigation measures would be required.**

³² *Hayward Planning Association et al. v. Board of Trustees of the California State University, Court of Appeal, First District, Division 3, California, decided November 30, 2015.*

(b) *Operation*

The following discussion considers the LAFD's primary criteria for determining the Project's impacts on fire protection services, including fire flows, response distance, and LAFD review of hydrants and access.

(i) *Facilities and Equipment*

The Project Site is currently developed with one vacant warehouse and a surface parking lot. The Project involves removal of the existing uses and construction of a mixed-use structure with live/work units and commercial uses and three subterranean parking levels. As discussed in **Section IV.I, Population and Housing** of this Draft EIR, the Project would be expected to generate new residents. Operation of the Project's commercial uses generate new full- and part-time jobs. Because it would increase the residential service population and the amount and scale of structural development on-site, the Project would increase the Project Site's demand for LAFD fire protection.

The Project Site is expected to continue to be served by Fire Station Nos. 17, 9 and 4. In addition, Fire Station No. 2 and Fire Station No. 25 would continue to be available to serve the Project Site as necessary. The Project would be well within the Fire Code's maximum one-mile fire response distance for an engine company and 1.5-mile response distance for a truck company for land uses within the Industrial and Commercial category, which the LAFD has determined is applicable to the Project. When response distances exceed these recommendations, all structures must be equipped with automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems.). The Project Site is located approximately 0.8-mile from Fire Station No. 17, 1.1 miles from Fire Station No. 9, and 1.3 miles from No. 4; therefore, the Project Site is located within the LAMC maximum response distance for both commercial and industrial land uses. Furthermore, as the response time for non-EMS and EMS calls at Fire Station No. 9 is within 6 minutes and the travel time is faster than the Citywide average, the Project Site is adequately served by existing fire protection services. Fire Station No. 4 and Fire Station No. 17 response times are slightly over the Citywide average.³³ As identified above, the LAFD determined, based on response distance from existing stations, fire protection would be considered adequate, and the Project would not require the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility in order to maintain service.

The Project would implement City Building and Fire Code requirements regarding Project components including, but not limited to, structural design, building materials, site access, clearance, hydrants, fire flow, storage and management of hazardous materials, alarm

³³ *City of Los Angeles Fire Department, Fire Stat LA, response metrics are from January through April 2020.*

and communications systems, and building sprinkler systems. Compliance with these requirements would be demonstrated as part of a plot plan that would be submitted to LAFD for review and approval prior to issuance of a building permit in accordance with City regulations. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, prior to the issuance of a building permit. The Project would be equipped with the following safety features as required by the Fire Code:

- **Building Design:** Fire resistant doors and materials, as well as walkways, wider stairwells and elevator systems (including emergency and fire control elevators with communication systems inside) that meet code requirements (Division 7 of the Fire Code).
- **Fire Safety Features:** Installation of automatic sprinkler systems, smoke detectors, and appropriate signage and internal exit routes to facilitate a building evacuation; as well as a fire alarm system, building emergency communication system, and a state of the art smoke control system (Division 9 of the Fire Code).
- **Emergency Safety Provisions:** Implementation of an Emergency Plan in accordance with LAMC Section 57.409. The Emergency Plan would establish dedicated personnel and emergency procedures to assist the LAFD during an emergency incident; establish a drill procedure to prepare for emergency incidents; establish an on-site Emergency Assistance Center; and establish procedures to be followed during an emergency incident. There would also be provision of on-site emergency equipment and emergency training for personnel to reduce the impacts on the need for emergency medical services. The Emergency Plan would be subject to the approval of the LAFD (Section 408.3 of the Fire Code).
- **LAFD Access:** Access for LAFD apparatus and personnel to the Project Site would be in accordance with LAFD requirements (Chapter 10 of the Fire Code).

As such, compliance with applicable regulatory requirements that are enforced through the City's building permitting process would ensure that adequate fire prevention features would be provided that would reduce the demand on LAFD facilities and equipment. With incorporation of applicable LAMC fire safety requirements, including those established in the Building Code, the Fire Code, and Table 57.507.3.1 of the LAMC (regarding fire flow requirements), along with the fact that the LAFD has no known or proposed plans to expand their fire protection facilities within the Arts District area at this time, the Project is not expected to result in a substantial increase in demand for additional fire protection services that would exceed the capability of Station Nos. 17, 9, and 4 to serve the Project such that it would require construction of new fire facilities.³⁴

³⁴ *Written Response from Kristin Crowley, Fire Marshal, Los Angeles Fire Department, July 3, 2018. Appendix K, of this Draft EIR.*

Furthermore, if a new fire station or the expansion, consolidation, or relocation of a station was determined warranted by LAFD, the Arts Districts community is highly developed and the site of a new fire station would likely be on an infill lot with its own environmental clearance. Most fire stations in the Project vicinity (including Fire Stations 3 and 17) are typically on lots of approximately 1-acre or less and generally, development associated with typical fire stations is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a fire station are anticipated to be addressed pursuant to CEQA through categorical exemptions or (mitigated) negative declarations since they are likely relatively small structures on infill parcels. Additionally, the protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. Accordingly, the need for additional fire protection services as part of an unplanned fire station at this time is not an environmental impact that the Project is required to mitigate.³⁵

(ii) *Fire Flows*

The minimum fire flow requirement for the Project based on correspondence with LAFD, which classifies the Project within the Industrial and Commercial land use category would be at least 6,000 to 9,000 gpm flowing from four to six hydrants at the same time.³⁶ A minimum residual water pressure of 20 pounds PSI is to remain in the water system while the required gpm of water is flowing. An IFFAR was submitted to LADWP regarding available fire hydrant flow to demonstrate compliance.³⁷ The completed IFFAR showed six hydrants flowing simultaneously for a combined flow of 9,000 gpm at 20 psi. As shown by the IFFAR, the Project Site has adequate fire flow available to demonstrate compliance with Section 57.507.3 of the LAMC. The final fire flow required for the Project would be established by the LAFD during its review of the Project plot plan, prior to the issuance of a building permit by the City. The plot plan would be required to identify the minimum fire flow requirements and the location of fire hydrants. Approval of this plot plan, and implementation of the applicable regulatory requirements would ensure the requisite fire flow for the Project Site.

(iii) *Emergency Access*

Emergency vehicle access to the Project Site would continue to be provided from major roadways adjacent to the Project Site, including Mateo Street and Imperial Street. Pedestrian access to the Project's various components would be provided from Mateo

³⁵ *Hayward Planning Association et al. v. Board of Trustees of the California State University, Court of Appeal, First District, Division 3, California, decided November 30, 2015.*

³⁶ *Written correspondence with Kristin Crowley, Fire Marshal, Los Angeles Police Department, dated July 3, 2018, **Appendix K** of this Draft EIR.*

³⁷ *676 Mateo Street Mixed-Use Project Utility Infrastructure Technical Report: Water, Exhibit 1, prepared by KPFF, December 10, 2018, **Appendix N.1** to this Draft EIR.*

Street and Imperial Street and via a paseo into the Project and building entrances oriented along these streets and the paseo. Pedestrian access to the commercial spaces on the second level would be accessible from the Project's courtyard deck via elevators and stairs. Pedestrian access to the live/work component would also be accessible from Mateo Street and Imperial Street, with Mateo Street providing the primary access to the live/work lobby. Vehicle access into the shared parking garage for the commercial and live/work uses would be available from Imperial Street to the three subterranean levels of the parking garage. Travel lanes would be maintained in each direction throughout the operation of the Project, and emergency access would not be impeded, including Alameda Street, which the Safety Element designates as a selected disaster route.³⁸ Furthermore, pursuant to California Vehicle Code Section 21806, emergency vehicles have priority on streets with sirens, options to avoid traffic with sirens, and drive in opposing traffic lanes.³⁹ Therefore, the increases in traffic from the Project would not greatly affect emergency vehicles because the drivers of emergency vehicles normally have a variety of options for avoiding traffic.

All ingress and egress access points that are proposed for the Project Site would comply with the Fire Code, including any additional access requirements of the LAFD. Emergency access to the Project Site would be maintained at all times. Furthermore, the Project would comply with all state and local building codes relative to fire protection, safety, and suppression, including those standards and requirements as set forth by Title 24 of the California Code of Regulations, the Safety Element, and the Fire Code.

In addition, upon completion of the Project and pursuant to LAMC Section 57.106.5.2, the LAFD would be provided with a diagram of each portion of the property, and this diagram would include access routes and any additional information that may facilitate LAFD response to the Project Site.

Based on the above, the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility, is not anticipated or needed to maintain service and, therefore, the potential for physical impacts associated with construction of fire facilities would be less than significant; no mitigation measures would be required.

(2) Mitigation Measures

Project-level impacts for the Project and the Flexibility Option, with regard to fire protection facilities, would be less than significant; no mitigation measures would be required.

³⁸ Los Angeles City Department of Planning, *Safety Element, Exhibit H, December 1990.*

³⁹ California Vehicle Code, Section 21806.

(3) Level of Significance After Mitigation

Project-level impacts for the Project and the Flexibility Option, with regard to fire protection facilities, would be less than significant without mitigation.

4. Cumulative Impacts

Due to the similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option, the impacts of the Project and the Flexibility Option related to contributions to cumulative impacts would be essentially the same. Therefore, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option.

a) Impact Analysis

The geographic scope of the cumulative fire protection analysis encompasses the service area for the LAFD in general, and Fire Station Nos. 17, 9, and 4, in particular. It is anticipated that the additional population and commercial activity would increase the demand for fire protection in the service areas for LAFD Fire Stations in the downtown area. The Project, in combination with the construction and operation of the Related Projects located within the service areas of these stations, would result in additional residential and commercial land uses within these service areas.

In addition, the DRAFT Central City Community Plan Update, known as the DTLA 2040 Plan, has been released by the Department of City Planning. According to the DTLA 2040 Plan projections, approximately 125,000 people, 70,000 housing units, and 55,000 jobs would be added to the Downtown area by the year 2040.⁴⁰ Only the initial period of any such projected growth would overlap with the Project's future baseline forecast, as the Project is anticipated to be completed by 2023, well before the Community Plan Update's horizon year. Moreover, the Project's projected buildout year is similar to those of many related projects. Accordingly, it can be assumed that the projected growth reflected by the list of related projects, which itself is a conservative assumption (as some of the related projects may not be built out by 2023), would account for any overlapping growth that may be assumed by the Community Plan Update upon its adoption.

The increase in development and residential service population from the Project and Related Projects would result in a cumulative increase in the demand for LAFD services. However, similar to the Project, the Related Projects would be reviewed on a project-by-project basis by the LAFD to ensure compliance with Fire Code and Building Code

⁴⁰ *Growth projections per the City of Los Angeles, DTLA 2040, About This Project.*

regulations related to emergency response, emergency access, fire flow, and fire safety that would reduce potential impacts to fire protection and emergency services. Project-by-project traffic mitigation, multiple fire station response, and system wide upgrades to improve response times, and other requirements imposed by the LAFD, are expected to help support adequate response times. Each of the Related Projects identified in the area would likewise be developed within urbanized locations that fall within an acceptable distance from one or more existing fire stations.

In addition, each Related Project would also be subject to the City's routine construction permitting process, which includes a review by LAFD for compliance with building and site design standards related to fire life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved. If Project construction were to occur concurrently with the construction of Related Project Numbers 1 and 15, which are located within approximately 500 feet of the Project Site, then specific coordination among these multiple construction sites would be required and implemented through the Project's Construction Management Plan (pursuant to PDF TR-1, in **Section IV.K, Transportation**, of this Draft EIR) which would include provisions for maintaining safety and emergency access to the adjacent rights-of-way during construction.

With regard to cumulative impacts on fire protection, consistent with *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) in Subsection 2.a.(1)(d) above, the obligation to provide adequate fire protection and emergency medical service is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, LAFD has not identified that it will be constructing a new station in the area impacted by this Project either because of this Project or this Project and other projects in the service area. If LAFD determines that new facilities are necessary at some point in the future, such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under *State CEQA Guidelines* Section 15301 or 15332 and would not be expected to result in significant impacts. Further analysis, including a specific location, would be speculative and beyond the scope of this document. As such, cumulative impacts on fire protection and emergency medical services would be less than significant.

Since the impact of the Project on its own would be less than significant, and since PDF TR-1 would require coordination with nearby construction projects, and since all Related

Projects will be required to comply with the Building and Fire Codes, the Project would not contribute to a cumulatively significant impact on fire protection services. **Based on the above analysis, the Project and Flexibility Option's contribution to cumulative impacts on fire protection would not be cumulatively considerable, and cumulative impacts would be less than significant.**

b) Mitigation Measures

Cumulative impacts related to fire protection for both the Project and Flexibility Option would be less than significant; no mitigation measures are required.

c) Level of Significance After Mitigation

Cumulative impacts related to fire protection for both the Project and Flexibility Option were determined to be less than significant without mitigation.

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IV. Environmental Impact Analysis

J. Public Services

2. Police Protection

1. Introduction

This subsection evaluates the potential impacts of the Project on police protection services and facilities in the Project area. The focus of the analysis is the Los Angeles Police Department (LAPD) facilities that currently serve the Project Site. This section uses information from the following resources: the Los Angeles Police Department (LAPD) website, Los Angeles General Plan, and written correspondence with Officer Christopher Gibson, Community Relationship Division, LAPD, **Appendix K** of this Draft EIR.

2. Environmental Setting

a) Regulatory Framework

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding police protection and emergency services in the state and City of Los Angeles (City). As described below, these plans and guidelines include the California Vehicle Code (CVC), Los Angeles General Plan Framework, City of Los Angeles Charter and Administrative and Municipal Codes, and Central City North Community Plan.

(1) Federal

No Federal regulations are relevant to the thresholds discussed below.

(2) State

(a) *California Constitution Article XIII, Section 35*

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: “The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services.” Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code

Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.⁴¹

(3) Regional

(a) *County of Los Angeles Department of Emergency Management*

The Office of Emergency Management was established by Chapter 2.68 of the County of Los Angeles Code with responsibility for organizing and directing the preparedness efforts, as well as the day-to-day coordination efforts, for the County's Emergency Management Organization, including the planning and coordinating of emergency response plans, overseeing operational readiness for emergency training for emergency responses, and public education related to emergency response.⁴²

(b) *Mutual Aid Operations Plan*

The County is required by state law to organize a formal mutual aid agreement between all police departments within its jurisdiction. This agreement is set forth in the Mutual Aid Operations Plan for the County. The Mutual Aid Operations Plan is a reciprocal agreement between signatory agencies (such as the County and City or other local police departments) to provide police personnel and resources to assist other member agencies during emergency and/or conditions of extreme peril. Any formal mutual aid requests by any police department within the County are made with the County Sheriff's Department; however, additional informal agreements may be made directly between the police agencies involved. The Mutual Aid Operations Plan is a formal agreement and has been signed by the Chief of Police of every police department within the County, including the Chief of the Los Angeles Police Department (the "LAPD"). The Mutual Aid Operations Plan provides a structure of response should an emergency arise which requires immediate response by more law enforcement personnel than would be available to the LAPD using all other available resources.⁴³

⁴¹ *City of Hayward v. Board Trustee of California State University* (2015) 242 Cal. App. 4th 833, 847.

⁴² *County of Los Angeles, Chief Executive Office, Office of Emergency Management, About OEM.*

⁴³ *County of Los Angeles Operational Area Emergency Response Plan.*

(4) Local

(a) *City Charter*

Under the City Charter, the Board of Police Commissioners (Police Commission) oversees the LAPD. The Police Commission sets overall policy while the Chief of Police manages the daily operations of the LAPD and implements the Commission's policies. Section 570 of the City Charter gives the power and duty to the LAPD to enforce the penal provisions of the City Charter and City ordinances, as well as state and federal law. The City Charter also gives LAPD the power to act as peace officers and to protect the lives and property in case of a disaster or public calamity.⁴⁴

(b) *Los Angeles General Plan*

(iv) *Framework Element*

The General Plan Framework Element (Framework Element), Chapter 9 Infrastructure and Public Services, contains policies and objectives which address the provision of police services within the City. These policies and objectives ensure that there is adequate service infrastructure as the population grows occurs by monitoring services, supporting the provision of additional police, and pursuing funding for additional officers. The applicable goals, objectives and policies in the Framework Element regarding Infrastructure and Public Services are:

Goal 9I: Every neighborhood in the City has the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.

Objective 9.13: Monitor and forecast demand for existing and projected police service and facilities.

Policy 9.13.1: Monitor and report police statistics and population projections for the purpose of evaluating existing and future police needs.

Objective 9.14: Protect the public and provide adequate police services, facilities, equipment and personnel to meet existing and future needs.

Policy 9.14.7: Participate fully in the planning of activities that assist in defensible space design and utilize the most current law enforcement technology affecting physical development.

Objective 9.15: Provide for adequate public safety in emergency situations.

Policy 9.15.1: Maintain mutual assistance agreements with local law enforcement agencies, State law enforcement agencies, and the

⁴⁴ See also, *Los Angeles Administrative Code Sections 22.212 et. seq.*

National Guard to provide for public safety in the event of emergency situations.

(v) *Safety Element*

The Safety Element of the Los Angeles General Plan (Safety Element) addresses natural hazard issues related to LAPD resources (e.g., traffic safety during or following a disaster) and recognizes that most jurisdictions rely on emergency personnel (police, fire, gas, and water) to respond to emergencies.⁴⁵ The Safety Element's objectives are broadly stated to reflect the comprehensive scope of the City's Emergency Operations Organization, including the LAPD. The Safety Element's policies outline administrative considerations that are addressed by Emergency Operations Organization procedures, including:

Objective 2.1: Develop and implement comprehensive emergency response plans and programs that are integrated with each other and with the City's comprehensive hazard mitigation and recovery plans and programs.

Objective 3.1: Develop and implement comprehensive disaster recovery plans which are integrated with each other and with the City's comprehensive hazard mitigation and emergency response plans and programs.

(vi) *Central City North Community Plan*

The City's Central City North Community Plan (adopted December 15, 2000) contains the following police protection objectives and policies applicable to the Project in Chapter III, Land Use Policies and Programs, Police Protection⁴⁶:

Objective 8-1: To provide adequate police facilities and personnel to correspond with population and service demands in order to provide adequate police protection.

Policy 8-1.1: Consult with the Police Department as part of the review of new development projects and proposed land use changes to determine law enforcement needs and demands.

Objective 8-2: To increase the community's and the Police Department's ability to minimize crime and provide adequate security.

Policy 8-2.1: Support and encourage community based crime prevention efforts (such as Neighborhood Watch and the Senior Lead Officer Program), through regular interaction and coordination with existing community based policing, foot and bicycle patrols, watch programs,

⁴⁵ *Safety Element of the Los Angeles General Plan.*

⁴⁶ *City of Los Angeles Planning Department, Central City North Community Plan.*

assistance in the formation of new neighborhood watch groups, and regular communication with neighboring and civic organizations.

Policy 8-2.2: Insure that landscaping around buildings be placed so as not to impede visibility.

Policy 8-2.3: Insure adequate lighting around residential, commercial, and industrial buildings in order to improve security.

Policy 8-2.4: Insure that recreational facilities in multiple family residential complexes are designed to provide visible security.

b) Existing Conditions

The LAPD is divided into four bureaus: Central Bureau, South Bureau, Valley Bureau, and West Bureau. Each of the bureaus encompasses several community police stations. As of April 2020, the departmental staffing resources within the LAPD included 9,990 sworn officers. Based on LAPD's estimated total City population of 4,029,741, the LAPD currently has an officer-to-resident ratio of 2.5 officers for every 1,000 residents.⁴⁷

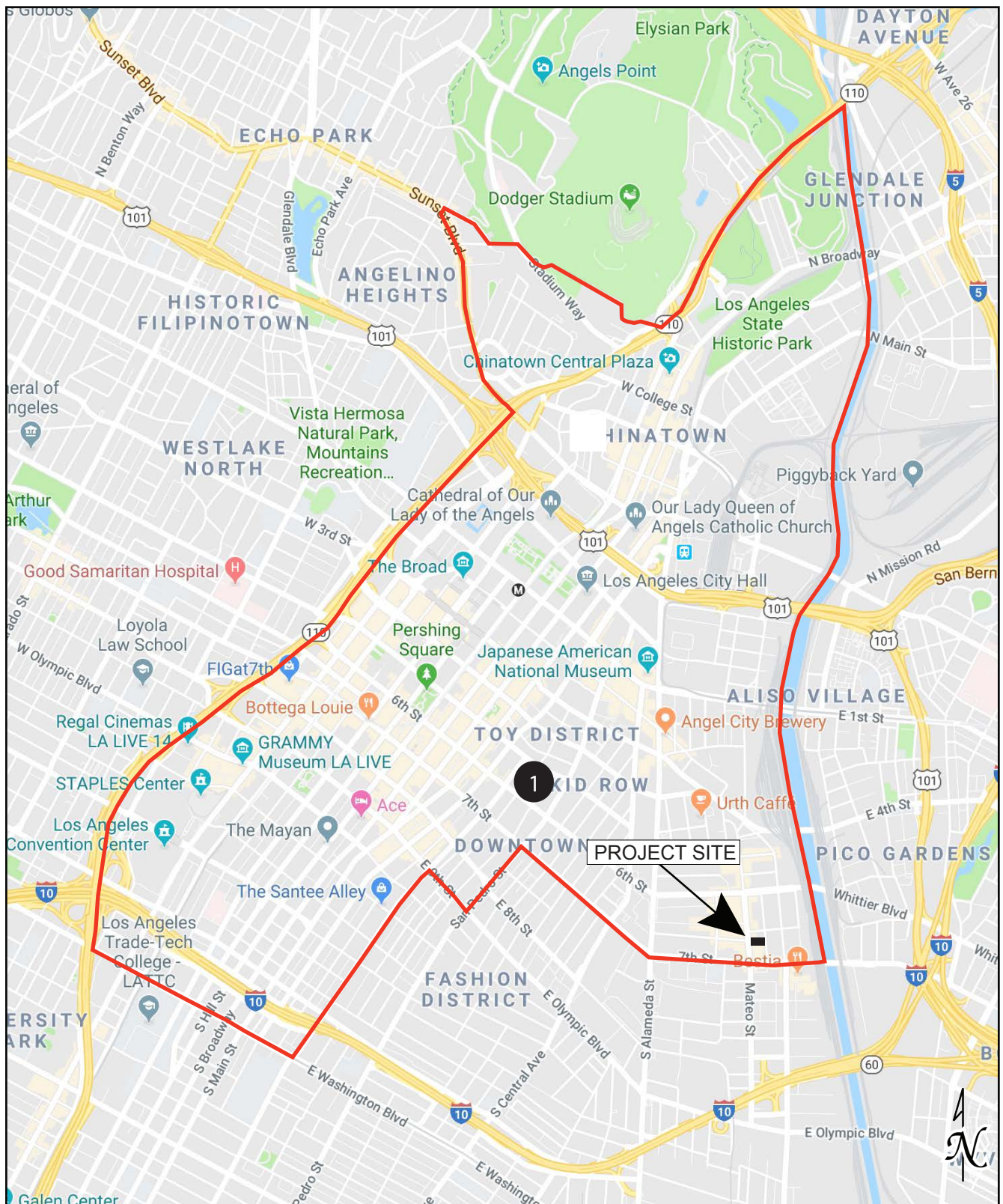
(1) Existing Police Stations

The Project Site is located within the LAPD Central Bureau. The Project Site would be served by the Central Community Police Station, located at 251 E. 6th Street, approximately 1.1 miles west the Project Site, within the Reporting District (RD) 0159.⁴⁸ **Figure IV.J.2-1, Police Station Location and Central Community Police Station Boundaries Map**, shows the location of the Central Community Police Station in relation to the Project Site. The geographic area of the Central Community Police Station covers approximately 4.5 square miles and consists of 52 Reporting Districts. The service boundaries for the Central Area, as shown on **Figure IV.J.2-1** are: Stadium Way and Pasadena Freeway to the north, Washington Boulevard and 7th Street to the south, the Los Angeles River to the east and the Harbor Freeway to the west. The community is culturally diverse with a population of approximately 40,000 people.⁴⁹

⁴⁷ LAPD, COMPSTAT Citywide Profile 03/01/20 to 03/28/20.

⁴⁸ Written Correspondence from Officer Christopher Gibson, Community Relationship Division, Los Angeles Police Department, dated July 26, 2017, **Appendix K** of this Draft EIR.

⁴⁹ Written Correspondence from Officer Christopher Gibson, Community Relationship Division, Los Angeles Police Department, dated July 26, 2017, **Appendix K** of this Draft EIR.



1 Central Community Police Station: 251 E. 6th Street

— Central Community Police Station Boundary

Source: Google Maps, August 2018.

Figure IV.J.2-1
Police Station Location and Central Community
Police Station Boundaries Map

The Central Police station currently has 370 sworn personnel and 30 civilian support staff assigned with an officer-to-population ratio of one officer per approximately 108 residents. Additionally, there are special service teams available within the LAPD to service the Central Area.⁵⁰ No official standard has been set by the City with respect to officer to population ratio.

(2) Response Times

Central Station's emergency response system is directly linked to the Los Angeles Police Department Communications Division's Dispatch Centers. Communications Division has the responsibility to staff and answer, on a 24-hour basis, the telephones upon which calls for service are received. This includes 911 emergency calls (police, fire, and paramedic). Communication Division handles only police related calls for the City. The average response time to emergency calls for service in Central Area during 2016 was 2.7 minutes. The average response time for non-emergency calls for service in Central Area during 2016 was 13.7 minutes.⁵¹

(3) LAPD Crime Statistics for Central Area

In 1994, the LAPD incorporated the use of the COMPSTAT (Computer Statistics) Plus Program. The COMPSTAT Unit implements the General Plan Framework goal of assembling statistical population and crime data to determine necessary crime prevention actions. This system implements a multi-layered approach to police protection services through statistical and geographical information system analysis of growing trends in crime through a specialized crime control model. COMPSTAT has been shown to reduce crime occurrences in Los Angeles communities through accurate and timely intelligence regarding emerging crime trends or patterns.⁵²

Table IV.J.2-1 on provides a comparison of the Central Community Police Station service area and citywide data regarding crimes as reported by the LAPD year to date (YTD) for the same reporting period 2018-2020 (through mid-June) based on the most recent data made available by the LAPD Community Relationship Division and COMPSTAT. As shown therein, the crime rate for the Central Area has accounted for approximately seven percent of violent crimes in the City and approximately six percent of property crimes in the City. This percentage has remained essentially consistent for at least the past three years (the data is only provided for 2018, 2019, and 2020).⁵³

⁵⁰ Written Correspondence from Officer Christopher Gibson, Community Relationship Division, Los Angeles Police Department, dated July 26, 2017, **Appendix K** of this Draft EIR.

⁵¹ Written Correspondence from Officer Christopher Gibson, Community Relationship Division, Los Angeles Police Department, dated July 26, 2017, **Appendix K** of this Draft EIR.

⁵² LAPD COMPSTAT program.

⁵³ LAPD COMPSTAT program.

**Table IV.J.2-1
Crime Statistics for all Central Area Compared to Citywide^a
2018-2020 Year to Date (YTD)**

CRIME	2020 YTD			2019YTD			2018 YTD		
	Central	Citywide	% of City	Central	Citywide	% of City	Central	Citywide	% of City
VIOLENT CRIMES									
Homicide	8	119	6.72	1	57	1.75	4	64	6.25
Rape	46	554	8.30	43	357	12.04	40	505	7.92
Robbery	248	3,563	6.96	160	2,314	6.91	155	2,456	6.31
Aggravated Assault	514	7,415	6.93	225	3,704	6.07	241	3,622	6.65
Total Violent Crimes	816	11,651	7.00	429	6,432	6.67	440	6,647	6.62
PROPERTY CRIMES									
Burglary	298	6,107	4.88	70	3,499	2.00	71	3,804	1.87
Motor Vehicle Theft	206	8,730	2.36	85	3,897	2.18	86	4,276	2.01
Burglary from Motor Vehicle	796	12,913	6.16	371	7,365	5.04	372	7,857	4.73
Personal/Other Theft	854	10,951	7.80	801	8,276	9.68	663	7,803	8.50
Total Property Crimes	2,154	38,701	5.57	1,327	23,037	5.76	1,192	23,740	5.02
a. LAPD COMPSTAT Central Area Profile week ending 6/13/20. Source: EcoTierra Consulting and LAPD, 2020.									

3. Project Impacts

a) Thresholds of Significance

In accordance with guidance provided in Appendix G to the *State CEQA Guidelines*, the Project could have a significant impact if it were to:

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

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the *L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G Threshold questions.

The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate police protection impacts:

- *The population increase resulting from the proposed project, based on the net increase of residential units or square footage of non-residential floor area;*

- *The demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and*
- *Whether the project includes security and/or design features that would reduce the demand for police services.*

b) Methodology

The environmental impacts of the Project with respect to police protection are determined based on a Project's need for a new or physically altered police station. While current response times, crime statistics, and congestion at surrounding intersections are relevant background information, these data are not used to determine police protection impacts under CEQA. The adequacy of police protection is evaluated using the existing number of police officers in the Project's police service area, the number of persons currently served in the area, the adequacy of the existing officer-to-population ratio in the area, and the number of persons that the Project would introduce to the area. Using these statistics, it is possible to estimate the future officer-to-population ratio in the area at project buildout and the number of officers that would be necessary to maintain the existing level of police protection (or, if the existing level is not considered adequate, the number required to obtain an adequate level of police protection). The analysis also reviews the Project characteristics and security and/or design features, and the use of on-site and private security provisions in assessing the potential effects of the Project on police services, as the need for additional officers can be reduced through on-site security design features. The increase in officers is then determined to be either accommodated within the existing police station(s) in the area, or may require the construction of a new or expansion of an existing police station. The need for or deficiency in adequate police protection services in and of itself is not a CEQA impact, but rather a social and/or economic impact.⁵⁴ Where a project causes a need for additional police protection services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in this EIR. The ultimate determination of whether there is a significant impact to the environment related to police protection services that would result from a project, is determined by whether the construction of new or expanded police protection facilities is a reasonably foreseeable direct or indirect effect of the project.

There are no current capital improvement plans for the construction or expansion of police facilities in the impact area. In the event that the City determines that expanded or new police facilities are warranted, such facilities (1) would occur where allowed under the

⁵⁴ City of Hayward v. Board of Trustees of California State University (2015) 242 Cal. App. 4th 833, 847.

designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size, and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under *State CEQA Guidelines* Section 15301 or 15332.

c) Project Design Features

As discussed, in **Section IV.K, Transportation**, of this Draft EIR, pursuant to Project Design Feature PDF TR-1, the Project Applicant would implement a Construction Management Plan that would include provisions for maintaining safety and access to the Project Site during construction. Additionally, the following Project Design Features would also be incorporated into the Project and are considered a part of the Project for purposes of the impact analysis.

- **PDF POL-1:** During construction, the Project would implement appropriate, temporary security measures including security fencing (e.g., chain-link fencing), low-level security lighting and locked entry (e.g., padlock gates or guard restricted access) to limit access by the general public. Regular and multiple security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) would also be provided. During construction activities, the Contractor would document the security measures; and the documentation would be made available to the Construction Monitor.
- **PDF POL-2:** The Project would provide an extensive security program to ensure the safety of residents, employees, and other visitors to the Project Site. The Project would incorporate strategies in design and planning, as well as active security features. On-site security measures during Project operation would include:
 - Provide on-site security personnel whose duties shall include but not be limited to the following:
 - Monitoring entrances and exits;
 - Patrol the perimeter of the property;
 - Control and monitor activities in the public spaces and private outdoor areas;
 - Managing and monitoring fire/life/safety systems; and
 - Controlling and monitoring activities in the parking facilities.
 - Install security industry standard security lighting at recommended locations including parking areas, pathways, and facing the adjacent alleyway;

- Install closed-circuit television at select locations including (but not limited to) entry and exit points, lobby areas, outdoor open spaces, and parking areas;
- Provide adequate lighting of parking areas, elevators, and lobbies to reduce areas of concealment;
- Provide lighting of building entries and open spaces to provide pedestrian orientation and to clearly identify a secure route between the parking areas and access points; and
- Contact information for on-site security staff would be prominently displayed throughout the Project Site.

d) Analysis of Project Impacts

As compared to the Project, the Flexibility Option would change the use of the second floor from residential to commercial, and would not otherwise change the Project's land uses or size. The overall commercial square footage provided would be increased by 22,493 square feet to 45,873 square feet and, in turn, there would be a reduction in the number of live/work units from 185 to 159 units and an increase in the number of bicycle spaces from 154 to 161. The overall building parameters would remain unchanged and the design, configuration, and operation of the Flexibility Option would be comparable to the Project. In the analysis of Project impacts presented below, where similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option would be essentially the same, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option. For those thresholds where numerical differences exist because of the differences in project parameters between the Project and Flexibility Option, the analysis is presented separately.

Threshold a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?

Numerical differences exist for these thresholds because of the differences in project parameters between the Project and Flexibility Option, therefore these analyses are presented separately.

(1) Impact Analysis

(a) *Project*

(i) *Construction*

Project construction would not substantially increase the police service population of the Central Area. Although the daytime population at the Project Site during construction would be temporary, construction sites can be sources of attracting nuisances, providing hazards, and inviting theft and vandalism. When not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters. Consequently, developers typically take precautions to prevent trespassing through construction sites. To provide such security for the Project during construction, a Work Area Plan will be provided and the Project will provide temporary fencing to be installed around the construction site as a Project Design Feature (see PDF POL-1). Deployment of on-site security guards is also an effective strategy in preventing crime during a project's construction, and the provision for regular and multiple security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) for duration of the construction period would also be part of the Project as a Project Design Feature (see PDF POL-1). With these security measures, there will be less need for local law enforcement services at the construction site, thereby reducing the demand for LAPD services.

Short-term Project construction activities would generate traffic associated with the movement of construction equipment, hauling of demolition and graded materials, and construction worker trips. Additionally, construction activities may involve temporary lane closures. Other implications of construction-related traffic include increased travel time due to flagging or stopping traffic to accommodate trucks entering and exiting the Project Site during construction. As such, construction activities could potentially affect emergency response for emergency vehicles traveling to the Project Site and nearby uses along surrounding streets.

The construction of the Project would not require the closure of any vehicle travel lanes. Temporary closures of the sidewalks adjacent to the Project Site on Mateo Street and Imperial Street may be required during portions of the construction period. However, signs would be posted advising pedestrians of temporary sidewalk closures and providing alternative routes (e.g., if the sidewalk on the east side of Mateo Street adjacent to the Project Site is closed during the construction period, signs would direct pedestrians to use the sidewalk on the west side of Mateo Street as an alternative route).

Furthermore, the Project is estimated to require a net export of approximately 74,500 cubic yards of soil, and thus, would require a haul route permit. The anticipated outbound haul route from the Project Site would be south on Mateo Street and east on E. 7th Street

to the Golden State Freeway (I-5), and the anticipated inbound haul route to the Project Site would be exiting the I-10 from Exit 16A toward Santa Fe Avenue and Mateo Street, west onto E. 8th Street, and north onto Mateo Street. Exported materials would likely be disposed at Sunshine Canyon Landfill in Sylmar. Hauling of material from the Project Site would occur on weekdays between 7:00 AM. and 6:00 PM (i.e., a 12-hour period) and Saturdays between 8:00 AM and 2:00 PM (i.e., an 8-hour period).

LAMC restricts construction activities to the hours of 7:00 A.M. to 9:00 P.M. on weekdays and from 8:00 A.M. to 6:00 P.M. on Saturdays and holidays. The hours of construction typically require workers to be on-site before the weekday A.M. commuter peak period and allow them to leave before or after the P.M. commuter peak period (i.e., arrive at the site prior to 7:00 AM and depart before 4:00 P.M. or after 6:00 P.M.). As described in **Section IV.K. Transportation**, Project construction at its most intense phase is expected to generate approximately 790 daily trips, which account for off-site hauling and deliveries, most of which are anticipated to occur during off-peak hours. Because a majority of construction traffic would occur during off-peak hours, and is temporary in nature, Project construction is not expected to cause a significant traffic impact at any of the analyzed intersections. Therefore, construction workers would reduce their potential effect on traffic and emergency response. Furthermore, construction-related traffic generated by the Project would not significantly impact LAPD emergency response within the Project vicinity as emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic.

Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAPD (see PDF POL-1), and the Project would implement a Construction Management Plan (refer to **Section IV.K, Transportation** of this Draft EIR).

Overall, upon implementation of the Project Design Features, construction-related impacts would be minimized and would not generate a demand for additional police protection services that would substantially exceed the capability of the LAPD to serve the Project Site. **Project construction would not necessitate the provision of new or physically altered government facilities in order to maintain the LAPD's capability to serve the Project Site; accordingly, the Project would not result in adverse physical impacts associated with the construction of new or altered facilities. Therefore, impacts on police protection services during Project construction would be less than significant; no mitigation measures would be required.**

(ii) *Operation*

The number of calls for police response relating to residential, commercial and vehicle burglaries, damage to vehicles, traffic-related incidents, any on-site sale and consumption of alcohol and crimes against persons could increase with the increase in on-site activity and increased traffic on adjacent streets and arterials. Design features that deter crime, including an extensive security program to ensure the safety of residents, employees, and other visitors, adequate and strategically positioned functional lighting in parking areas, pathways, and lighting up the adjacent alleyway to enhance public safety and minimizing visually obstructed and infrequently accessed “dead zones,” reduce the demand for police services (see PDF POL-2).

(a) *Officer-to-Population Ratio*

Implementation of the Project would result in an increase of residents, site visitors, and employees within the Project Site. As previously identified (under Existing Conditions) above, the Central Community Police Station has 370 sworn officers serving a population of approximately 40,000 residents for an officer-per-resident ratio of one officer per 108 residents.⁵⁵ No official standard has been set by the City with respect to officer to population ratio.

The Project Site is currently occupied by a warehouse and associated parking with approximately 94 employees and no residents. The Project involves the construction of 185 live/work units and 23,380 square feet of commercial uses. As identified in **Section IV.I, Population and Housing**, of this Draft EIR, the Project would generate approximately 448 residents and 92 employees, which represents a net increase of 448 residents and a net *decrease* of 2 employees on the Project Site compared to existing conditions.⁵⁶ Following development of the Project the residential service population would increase to 40,448 residents resulting in an approximate officer-to-resident ratio of one officer per 109 residents ($40,448 \text{ residents} / 370 \text{ officers} = 109$). This represents a less than one percent change in the officer-per-resident ratio of the service area. Additionally, the officer-to-resident ratio of 1 officer per 109 residents (9 officers per 1,000 residents) would still be substantially higher than the citywide ratio of 2.5 officers per 1,000 residents.

It is highly unlikely that the negligible decrease in the officer-to-population ratio would require the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities.

⁵⁵ *Written Correspondence from Officer Christopher Gibson, Community Relationship Division, Los Angeles Police Department, dated July 26, 2017, **Appendix K** to this Draft EIR.*

⁵⁶ *However, as the ratio is officer per resident the decrease in number of employees does not impact the ratio.*

To further prevent the Project from impacting police services in the Central Community Station area, as noted above, the Project would incorporate crime prevention measures into the Project's design as well as implement comprehensive safety and security measures, including adequate and strategically positioned functional and thematic lighting to enhance public safety, installation of closed-circuit television at select locations including (but not limited to) entry and exit points, lobby areas, outdoor open spaces, and parking areas, and provision of on-site security personnel. The measures are incorporated into the Project as PDF POL-2. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security controlled to limit public access. The building and layout design of the Project would also include crime prevention features, such as nighttime security lighting and a secure parking structure enclosed within the building. These preventative and proactive security measures would decrease the amount of service calls the LAPD would receive involving the Project or the immediate surrounding vicinity.

(b) Emergency Access

Emergency access to the Project Site would be provided by the existing street system. The Project would be designed and constructed in accordance with LAMC requirements to ensure proper emergency access.

As discussed in **Section IV.K, Transportation**, emergency access would be maintained to the Project Site during construction through marked emergency access points and all traffic and access controls would be addressed by a Construction Management Plan, as indicated in PDF TR-1. During operation, the Project would cause significant traffic impacts at three intersections (Alameda Street/7th Street (Int. No. 3), Mateo Street/7th Street (Int. No. 7), and Santa Fe Street/7th Street (Int. No. 8)). The Project Site is also accessible from additional streets, including 6th Street, Imperial Street, and Industrial Street. However, police units are most often in a mobile state; therefore, it is unknown precisely which route the LAPD would use to access the Project Site when responding to an emergency call. In addition, the police have a variety of options to avoid traffic, such as using sirens to clear a path of travel for driving in the lanes of opposing traffic.

(iii) Summary

With incorporation of PDF POL-1 and PDF POL-2, along with the fact that LAPD has no known or proposed plans to expand their police facilities within the Arts District area at this time, the Project is not expected to result in a substantial increase in demand for additional police protection services that would exceed the capability of the LAPD to serve the Project such that it would require construction of new police facilities. Furthermore, the protection of public safety is the first responsibility of local government and local

officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds.

Based on the above analysis, the Project will incorporate a number of measures to deter crime and minimize police demand, and is not anticipated to generate a demand for additional police protection services that could exceed the LAPD's capacity to serve the Project Site or necessitate the construction of new or expanded facilities. Furthermore, the Project would not substantially affect emergency response as a result of traffic congestion attributable to the Project. **Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable police protection services; no mitigation measures are required.**

(b) Increased Commercial Flexibility Option

Under the Flexibility Option, the commercial square footage provided would be increased to 45,873 square feet by replacing 26 live/work units within the same building parameters and, in turn, there would be a reduction in the overall number of live/work units for a total of 159 units. As discussed in **Section IV.I, Population and Housing**, of this Draft EIR, approximately 385 new residents would occupy the 159 units on the Project Site, compared to 448 new residents with the Project and the Flexibility Option would generate approximately 151 employees, which would result in a net increase of approximately 57 employees on the Project Site. Following development of the Flexibility Option the residential service population would increase to 40,385 residents resulting in an approximate officer-to-resident ratio of one officer per 109 residents ($40,385 \text{ residents} / 370 \text{ officers} = 109$). Similar to the Project, this represents a less than one percent change in the officer-per-resident ratio of the service area. Additionally, the officer-to-resident ratio of 1 officer per 109 residents (9 officers per 1,000 residents) would still be substantially higher than the citywide ratio of 2.5 officers per 1,000 residents. Overall, the design, configuration, construction, and operation of the Flexibility Option would be comparable to the Project. Similar to the Project, with incorporation of PDF POL-1 and PDF POL-2, along with the fact that LAPD has no known or proposed plans to expand their police facilities within the Arts District area at this time, the Flexibility Option is not expected to result in a substantial increase in demand for additional police protection services that would exceed the capability of the LAPD to serve the Flexibility Option such that it would require construction of new police facilities. Furthermore, the protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. **Therefore, impacts related**

to police protection services under the Flexibility Option would be less than significant; no mitigation measures are required.

(2) Mitigation Measures

Project-level impacts for the Project and the Flexibility Option, with regard to fire protection facilities, would be less than significant; no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts for the Project and the Flexibility Option, with regard to police protection services, would be less than significant without mitigation.

4. Cumulative Impacts

Numerical differences exist regarding the impact analysis and impact significance determination presented below because of the differences in project parameters between the Project and Flexibility Option, therefore these analyses are presented separately.

a) Impact Analysis

As identified in **Section III, Environmental Setting**, of this Draft EIR, there are 20 Related Projects located in the Project vicinity. Cumulative growth in the Project vicinity includes approved, under construction, proposed, or reasonably foreseeable projects within the vicinity of the Project that could produce a related or cumulative impact on the local environment when considered in conjunction with the Project. As such, these Related Projects would have the potential to combine with the Project and cumulatively impact the Central Community Police Station. Based on the boundaries of the Central Community Police Station, shown in **Figure IV.J.2-1, Police Station Location and Central Community Police Station Boundaries Map**, the 20 Related Projects (identified in **Table III-1** in **Section III, Environmental Setting**, of this Draft EIR) are within the jurisdiction of the Central Community Police Station.

(1) Project

(a) Construction

In general, impacts to LAPD services and facilities during the construction of each Related Project would be addressed as part of each Related Project's development review process conducted by the City. Should Project construction occur concurrently with Related Projects in close proximity to the Project Site, specific coordination among these multiple construction sites would be required and implemented through the Project's Construction Management Plan, as indicated in PDF TR-1, (as well as the required

construction management plans for the nearby Related Projects), which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-way. In addition, similar to the Project, each Related Project would also be subject to the City's routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Furthermore, construction-related traffic generated by the Project and the Related Projects would not significantly affect LAPD response within the Project Site vicinity as drivers of police vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. **Therefore, the Project's contribution to cumulative impacts on either police protection or emergency services during construction would not be cumulatively considerable, cumulative impacts would be less than significant.**

(b) Operation

The geographic scope of the cumulative police protection analysis encompasses the service area for the LAPD in general, and the Central Community Police Station service area specifically. The Project, in combination with the construction and operation of the 20 Related Projects, would generate approximately 15,005 full- and part-time jobs and approximately 13,289 residents in the general area of the Project Site as indicated in **Table IV.I-7, Cumulative Development**, in **Section IV.I, Population and Housing**, of this Draft EIR. The table presents and quantifies the employee and population generated by the Related Projects. All 20 Related Projects are located within the boundaries of the Central Community Police Station.

It is assumed that the addition of 15,005 full- and part-time jobs and approximately 13,289 residents would create demand for additional officers. The current officer-per-resident ratio for the Central Community Police Station is one officer per 108 residents (40,000 residents/370 officers = one officer/108 residents). Adding the projected estimates to the existing service population, using the same formula as above, and conservatively assuming that all 20 Related Projects are built as currently proposed, future officer-per-resident ratio could be one officer per 144 residents (53,289 residents/370 officers = 144 residents) for the Central Community Police Station. However, as discussed above, the Project's 448 residents (and a net negative 2 employees), would result in an officer-to-population ratio of one to 109, a less than one percent decrease in the current officer-to-population ratio of one to 108, which is considered minimal, particularly when compared to the potential cumulative total. Further, the projected cumulative police service ratio of one officer per 144 residents, or 6.9 officers per 1,000 residents (370 officers/53,289 residents = 0.0039 x 1,000=6.9) is higher than the citywide ratio of 2.5 officers per 1,000 residents. In addition, over time, LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing and possibly station expansions or new stations construction that may become

necessary to achieve desired level of service. Through the City's regular budgeting efforts, LAPD's resource needs would be identified and monies allocated according to the priorities at the time.

Similar to the Project, each Related Project would be subject to the City's routine permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. In accordance with police protection-related goals, objectives, and policies set forth in the Framework, as listed in the regulatory framework above, the LAPD would also continue to monitor population-growth and land development throughout the City and identify additional resource needs, including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated according to the priorities at the time. In addition, it is anticipated that the Related Projects would implement project design features similar to the Project and other mitigation measures (as necessary), which would reduce cumulative impacts to police protection services.

In addition to the capabilities of the Central Station to serve the Project Site and surrounding areas, including the Related Projects, growth in residential population and development throughout the City could increase demand for LAPD staffing, equipment, and facilities Citywide. These demands are met by LAPD through the allocation of available resources by LAPD management to meet varying needs throughout the LAPD's Bureaus and Community Police Stations, as well as through the allocation of City resources between LAPD and other City departments, which is accomplished through the City's annual programming and budgeting processes. Through implementation of these existing management and regulatory processes, the cumulative demand for police protection is identified and addressed to the satisfaction of the City's elected leadership, and thus the Project, in combination with growth in demand for police protection services. Further, the Project impact analysis determined the impact on police protection would be less than significant.

As discussed previously, the LAPD has no known or proposed plans to expand police facilities or construct new facilities within its Central Area. If a new police station, or the expansion, consolidation, or relocation of an existing station were determined to be warranted by LAPD, the Downtown area is highly developed, and the site of a police station would foreseeably be an infill lot less than an acre in size, which would meet the requirements for the use of a Class 32 categorical infill exemption (*State CEQA Guidelines* Section 15332). Development of a station at this scale is unlikely to result in significant impacts, and projects involving the construction or expansion of a police station would be addressed independently pursuant to CEQA. With regard to cumulative impacts on police protection, consistent with *City of Hayward v. Board Trustees of*

California State University (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) in Subsection 2.a.(1)(a) above, the obligation to provide adequate public safety services, including police protection, is the responsibility of the City. Through the City's regular budgeting efforts, LAPD's resource needs, including staffing and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. Further analysis, including a specific location, would be speculative and beyond the scope of this document. As such, cumulative impacts on police protection would be less than significant.

Since the impact of the Project on its own would be less than significant, and since all Related Projects will be subject to review by the LAPD, and since existing management and regulatory processes adequately identify and address demand for police protection services, the Project would not contribute to a cumulatively significant impact on police protection services. Therefore, based on the above analysis, cumulative impacts related to police protection services would be less than significant.

(2) Increased Commercial Flexibility Option

(a) Construction

In general, impacts to LAPD services and facilities during the construction of each Related Project would be addressed as part of each Related Project's development review process conducted by the City. Similar to the Project, should the Flexibility Option construction occur concurrently with Related Projects in close proximity to the Project Site, specific coordination among these multiple construction sites would be required and implemented through the Flexibility Option's Construction Management Plan, as indicated in PDF TR-1, (as well as the required construction management plans for the nearby Related Projects), which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-way. In addition, similar to the Flexibility Option, each Related Project would also be subject to the City's routine construction permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Furthermore, construction-related traffic generated by the Flexibility Option and the Related Projects would not significantly affect LAPD response within the Project Site vicinity as drivers of police vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. **Therefore, the Flexibility Option's contribution to cumulative impacts on either police protection or emergency services during construction would not be cumulatively considerable, cumulative impacts would be less than significant.**

(b) *Operation*

The geographic scope of the cumulative police protection analysis encompasses the service area for the LAPD in general, and the Central Community Police Station service area specifically. Adding the projected estimates to the existing service population, using the same formula as above, and conservatively assuming that all 20 Related Projects are within the jurisdiction of the Central Community Police Station, the Flexibility Option in combination with the Related Projects would generate approximately 15,064 full- and part-time jobs and approximately 13,226 residents in the general area of the Project Site as indicated in **Table IV.I-9, Total Cumulative Development (Flexibility Option)**, in **Section IV.I, Population and Housing**, of this Draft EIR. The current officer-per-resident ratio for the Central Community Police Station is one officer per 108 residents (40,000 residents/370 officers = one officer/108 residents). The Flexibility Option's 385 residents, would result in an officer-to-population ratio of one to 109, a less than one percent decrease in the current officer-to-population ratio, which is considered minimal, particularly when compared to the potential cumulative total. Further, the projected cumulative police service ratio of one officer per 144 residents, or 6.7 officers per 1,000 residents (370 officers/53,226 residents = 0.0039 x 1,000=6.7) is higher than the citywide ratio of 2.5 officers per 1,000 residents. In addition, over time, LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing and possibly station expansions or new stations construction that may become necessary to achieve desired level of service. Through the City's regular budgeting efforts, LAPD's resource needs would be identified and monies allocated according to the priorities at the time.

Similar to the Flexibility Option, each Related Project would be subject to the City's routine permitting process, which includes a review by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. In accordance with police protection-related goals, objectives, and policies set forth in the Framework, as listed in the regulatory framework above, the LAPD would also continue to monitor population-growth and land development throughout the City and identify additional resource needs, including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated according to the priorities at the time. In addition, it is anticipated that the Related Projects would implement project design features similar to the Flexibility Option and other mitigation measures (as necessary), which would reduce cumulative impacts to police protection services.

In addition to the capabilities of the Central Station to serve the Project Site and surrounding areas, including the Related Projects, growth in residential population and development throughout the City could increase demand for LAPD staffing, equipment,

and facilities Citywide. These demands are met by LAPD through the allocation of available resources by LAPD management to meet varying needs throughout the LAPD's Bureaus and Community Police Stations, as well as through the allocation of City resources between LAPD and other City departments, which is accomplished through the City's annual programming and budgeting processes. Through implementation of these existing management and regulatory processes, the cumulative demand for police protection is identified and addressed to the satisfaction of the City's elected leadership, and thus the Flexibility Option, in combination with growth in demand for police protection services. Further, the Flexibility Option impact analysis determined the impact on police protection would be less than significant.

As discussed previously, the LAPD has no known or proposed plans to expand police facilities or construct new facilities within its Central Area. If a new police station, or the expansion, consolidation, or relocation of an existing station were determined to be warranted by LAPD, the Downtown area is highly developed, and the site of a police station would foreseeably be an infill lot less than an acre in size, which would meet the requirements for the use of a Class 32 categorical infill exemption (*State CEQA Guidelines* Section 15332). Development of a station at this scale is unlikely to result in significant impacts, and projects involving the construction or expansion of a police station would be addressed independently pursuant to CEQA. With regard to cumulative impacts on police protection, consistent with *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833 ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2) in Subsection 2.a.(1)(a) above, the obligation to provide adequate public safety services, including police protection, is the responsibility of the City. Through the City's regular budgeting efforts, LAPD's resource needs, including staffing and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. Further analysis, including a specific location, would be speculative and beyond the scope of this document. As such, cumulative impacts on police protection would be less than significant.

Since the impact of the Flexibility Option on its own would be less than significant, and since all Related Projects will be subject to review by the LAPD, and since existing management and regulatory processes adequately identify and address demand for police protection services, the Project would not contribute to a cumulatively significant impact on police protection services. Therefore, based on the above analysis, cumulative impacts related to police protection services would be less than significant.

b) Mitigation Measures

Cumulative impacts related to police protection services for both the Project and Flexibility Option would be less than significant; no mitigation measures are required.

c) Level of Significance After Mitigation

Cumulative impacts related to police protection services for both the Project and Flexibility Option were determined to be less than significant without mitigation.



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IV. Environmental Impact Analysis

J. Public Services

3. Schools

1. Introduction

This subsection describes the impacts of the Project on school services and facilities operated by the Los Angeles Unified School District (LAUSD), which has jurisdiction of public schools that serve the Project area. This section utilizes information from the following resources: the Los Angeles Unified School District website, *2018 Developer Fee Justification Study for Los Angeles Unified School District, March 2018* (Los Angeles Unified School District), the Employment Development Department website, and a written correspondence with Rena Perez, Director of Master Planning & Demographics of the Los Angeles Unified School District dated July 12, 2017, attached as **Appendix K** to this Draft EIR.

2. Environmental Setting

a) Regulatory Framework

(1) California Education Code

The facilities and educational services of the LAUSD are subject to the rules and regulations of the California Education Code and governance of the State Board of Education. Traditionally, the State has passed legislation for the funding of local and public schools and provided the majority of monies to fund education in the State. To assist in providing facilities to serve students generated from new development projects, the State passed Assembly Bill 2926 in 1986, allowing school districts to collect impact fees from developers of new residential, commercial, and industrial developments. Development impact fees are also referenced in the 1987 Leroy Greene Lease-Purchase Act, which requires school districts to contribute a matching share of the costs for the construction, modernization, or reconstruction of school facilities. Subsequent legislation has modified the fees structure and general guidelines.

(2) Open Enrollment Policy

The State of California mandates an open enrollment policy that enables students anywhere in the Los Angeles Unified School District (LAUSD) to apply to any regular,

grade-appropriate LAUSD school with designated “open enrollment” seats.⁵⁷ The number of open enrollment seats is determined annually. Each individual school is assessed based on the principal’s knowledge of new housing and other demographic trends in the attendance area. Open enrollment seats are granted through an application process that is completed before the school year begins. Students living in a particular school’s attendance area are not displaced by a student requesting an open enrollment transfer to that school.⁵⁸

(3) School Facilities Fees

California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan supports the school district’s levy of the fees authorized by California Education Code Section 17620.⁵⁹

The Leroy F. Greene School Facilities Act of 1998 (known as Senate Bill 50), enacted in 1998, is a program for funding school facilities largely based on matching funds. The new construction grant provides funding on a 50/50 State and local match basis. The modernization grant provides funding on a 60/40 basis. Districts that are unable to provide some, or all, of the local match requirement and are able to meet the financial hardship provisions may be eligible for additional State funding. Senate Bill 50 (SB50) made significant amendments to existing State law governing school fees. In particular, SB 50 amended prior Government Code Section 65995(a) to prohibit state or local agencies from imposing school impact mitigation fees, dedications, or other requirements in excess of those provided in the statute in connection with “any legislative or adjudicative act...by any State or local agency involving...the planning, use, or development of real property....” The legislation also amended Government Code Section 65996(b) to prohibit local agencies from using the inadequacy of school facilities as a basis for denying or conditioning approvals of any “legislative or adjudicative act [involving] the planning, use, or development real property.” Further, SB 50 established the base amount of allowable developer fees. These base amounts are commonly called “Level 1 fees” and are the same caps that were in place at the time SB 50 was enacted. Level 1 fees are subject to inflation adjustment every two years.

In certain circumstances, for residential construction, a school district can impose fees that are higher than Level 1 fees. School districts can impose Level 2 fees, which are equal to 50 percent of land and construction costs if they: (1) prepare and adopt a school

⁵⁷ LAUSD website, *K–12 Open Enrollment*.

⁵⁸ News Release, *Los Angeles Unified School District, Office of Communications, April 17, 2000*.

⁵⁹ *2018 Developer Fee Justification Study for Los Angeles Unified School District, March 2018, page 2*.

needs analysis for facilities; (2) are determined by the State Allocation Board to be eligible to impose these fees; and (3) meet at least two of the following four conditions:

1. At least 30 percent of the district's students are on a multi-track year-round schedule.
2. The district has placed on the ballot within the previous four years a local school bond that received at least 50 percent of the votes cast.
3. The district has passed bonds equal to 30 percent of its bonding capacity.
4. Or, at least 20 percent of the district's teaching stations are relocatable classrooms.

Additionally, if the State's bond funds are exhausted, a school district that is eligible to impose Level 2 fees is authorized to impose even higher fees. Commonly referred to as "Level 3 fees," these fees are equal to 100 percent of land and construction costs of new schools required as a result of new developments.

Development fees are required to be paid pursuant to development conditions of approval. Pursuant to SB 50, the payment of these school fee amounts provided for in Government Code Sections 65995, 65995.5, and 65995.7 would constitute full and complete mitigation for school facilities. That is to say, SB 50 states that the exclusive method of mitigating the impacts to school facilities under CEQA is to pay the maximum school fees and that such fees are "deemed to provide full and complete school facilities mitigation" related to the adequacy of school facilities when considering approval or the establishment of conditions for the approval of a development project (Government Code Section 65996[a] and [b]).

Pursuant to California Government Code Section 65995.5-7, the LAUSD currently, LAUSD collects the maximum new school construction facility fee at a rate of \$3.48 per square foot of new residential construction, \$0.56 per square foot of commercial construction, \$0.27 per square foot of self-storage structure, and \$0.37 per square foot of parking structure.⁶⁰ Payment of the LAUSD new school construction facility fee is required prior to issuance of building permits. It should be noted that LAUSD last assessed a Level 2 Fee in 2012-2013 but is not currently eligible to assess Level 2 Fees due to excess facility capacity issues at the elementary level. Pursuant to Government Code Section 65996, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities to less-than-significant levels.

⁶⁰ *Los Angeles Department of Building and Safety, News Details, School Fee Rate Changes Effective July 10.*

(4) Property Tax

Operation of California's public school districts, including the LAUSD, is largely funded by local property tax. While property tax is assessed at a local level, it is the State that allocates tax revenue to each district according to average daily attendance rates.

(5) Central City North Community Plan

The Central City North Community Plan, which covers the Project Site, contains the following school-related goal, objective and policy applicable to the Project:⁶¹

Chapter III, Land Use Policies and Programs, Schools:

Objective 6-1: To site schools in locations complementary to existing land uses, recreational opportunities and community identity.

Policy 6-1.1: Encourage compatibility in school locations, site layout and architectural design with adjacent land uses and community character and, as appropriate, use schools to create a logical transition and buffer between different uses e.g., multiple family residential versus single family residential.

Policy 6-1.2: Encourage cooperation between the Los Angeles Unified School District, and the Los Angeles County Parks and Recreation Department to provide recreational facilities for the community.

b) Existing Conditions

(1) Los Angeles Unified School District

The LAUSD is the second largest school district in the nation and covers an area totaling 710 square miles. It encompasses most of the City of Los Angeles, along with all or portions of 26 cities and unincorporated areas of Los Angeles County. The estimated student enrollment for 2019-2020 includes approximately 557,560 students in kindergarten through 12th grade and an additional 30,000 students in special education programs and continuation schools for an approximate total of 587,359 students. Additionally, early education and adult education programs enroll approximately 18,988 and 64,527 students respectively.⁶² The LAUSD has jurisdiction over 19 primary school centers, 441 elementary schools, 79 middle schools, 92 high schools, 54 option schools, 53 magnet schools, 25 multi-level schools, 13 special education schools, two

⁶¹ *City of Los Angeles, Central City North Community Plan, 2000.*

⁶² *Los Angeles Unified School District, Fingertip Facts 2019-2020.*

home/hospital, 239 K-12 magnet centers (on regular campuses), 228 charter schools and 142 other schools and centers.⁶³

The LAUSD is currently divided into six local districts (Northeast, Northwest, East, West, Central, and South); with the Project Site being located in the Local District East.⁶⁴ Pursuant to the LAUSD, the Project Site is located within the attendance boundaries of 9th Street Elementary School Hollenbeck Middle School, and within the Boyle Heights Academic Zone of Choice.⁶⁵ The Boyle Heights Academic Zone of Choice offers three schools options to residents within this attendance boundary: Boyle Heights Science, Technology, Engineering and Math (STEM) High School, Theodore Roosevelt High School and Felicitas & Gonzalo Mendez High School. Additionally, Roosevelt High School hosts a by-application magnet center, Roosevelt Math, Science and Technology Magnet Academy. There is an additional school, Metropolitan Continuation High School, with enrollment permitted through referral, which is a high school for students that have fallen behind on credits. These schools currently operate under a single-track calendar. **Figure IV.J.3-I, School Location Map**, shows the location of the public schools in relation to the Project Site.

Table IV.J.3-1, LAUSD Schools Enrollment and Capacity, presents the capacity, enrollment, and seating shortages or overages for each of these schools. All data present in the table already account for portable classrooms on site, additions being built onto existing schools, student permits and transfers, specific educational programs running at the schools, and any other operational activities or educational programming that affects the capacities and enrollments of LAUSD's schools.⁶⁶

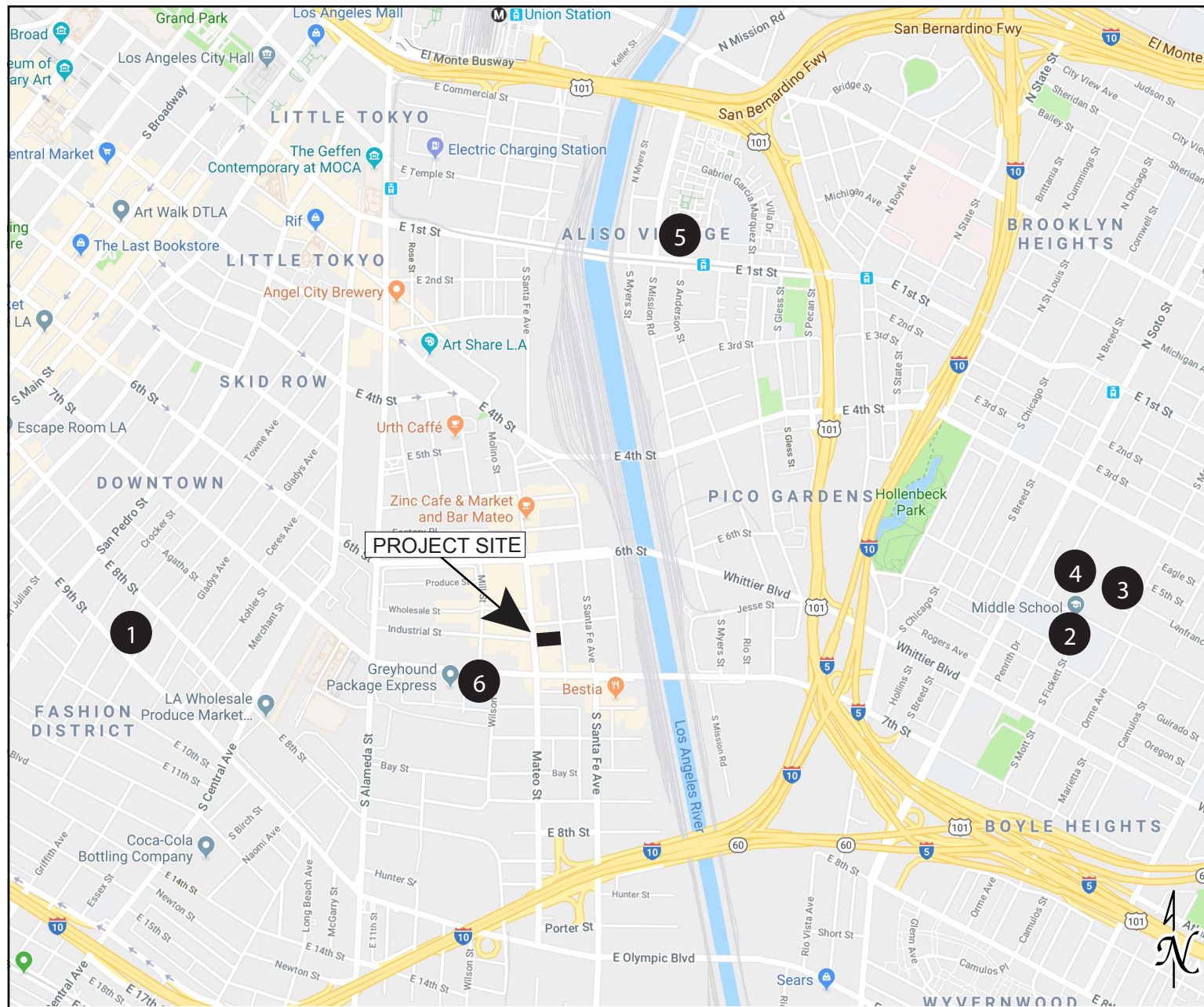
Resident enrollment is defined as the total number of students living in the school's attendance area who are eligible to attend the school, including magnet students, and actual enrollment is defined as the number of students actually attending the school currently, including magnet students. Available seating capacity is based on residential enrollment (i.e., the number of students living in a school's attendance area who are eligible to attend the school) compared to the respective school's capacity. The goal of the calculation is to determine the number of seats that are available for students residing within the attendance boundary. LAUSD considers a school to be overcrowded if any one of the following occurs: 1) it currently operates on a multi-track calendar; 2) there is currently a capacity shortage; or 3) there is currently a capacity overage of less than or equal to "safety margin" of 20 seats (e.g., if the available capacity is 20 seats or fewer).

⁶³ Los Angeles Unified School District, *Fingertip Facts 2019-2020*.

⁶⁴ LAUSD Map, *Local District East*.

⁶⁵ Written correspondence with Rena Perez, Director of Master Planning & Demographics, LAUSD, July 12, 2017, **Appendix K** to this Draft EIR.

⁶⁶ Written correspondence with Rena Perez, Director of Master Planning & Demographics, LAUSD, July 12, 2017, **Appendix K** to this Draft EIR.



Source: Google Maps, August 2018.

Figure IV.J.3-1
School Location Map

**Table IV.J.3-1
Existing (2016-2017) LAUSD School Capacity and Enrollment**

School Name	Current Capacity ^b	Resident Enrollment ^c	Actual Enrollment ^d	Current Seating Overage/ (Shortage) ^e	Overcrowded ^f
9th Street Elementary School (K-5)	360	287	342	73	No
Hollenbeck Middle School (6-8)	1,453	1,370	1,073	83	No
School Choice Area Totals^a	3,300	3,688	2,682	(388)	Yes
Boyle Heights Academic Zone of Choice					
Boyle Heights STEM High School	344	-	200	-	-
Roosevelt Senior High School	1,817	-	1,485	-	-
Mendez Senior High School	1,139	-	997	-	-

Notes:

- a Schools and programs that are part of a "school choice area" pull enrollments from the school(s) that have resident areas, as defined by attendance boundaries. The individual school and calculated total capacities and enrollments for school choice areas are reported to show current and projected seating overage/shortage and overcrowding. If any of the school choice area schools is multi-track, then the service area is considered overcrowded.*
- b School's current operating capacity, or the maximum number of students the school can serve while operating on its current calendar. Excludes capacity allocated to charter co-locations. Includes capacity for magnet program.*
- c The total number of students living in the school's attendance area and who are eligible to attend the school plus students enrolled at any on-site magnet centers.*
- d The number of students actually attending the school now, including magnet students.*
- e Current seating overage or (shortage): equal to (current capacity) – (resident enrollment)*
- f Current overcrowded status of the school. The school is currently overcrowded if any of these conditions exist: 1) school is currently on a multi-track calendar; 2) there is currently a seating shortage; or 3) there is a seating overage of LESS THAN or EQUAL TO a "safety margin" of 20 seats.*

*Source: LAUSD Schools Enrollments and Capacities Report; Written correspondence with Rena Perez, Director of Master Planning & Demographics, LAUSD, July 12, 2017, **Appendix K** of this Draft EIR.*

LAUSD also projects the future capacity of its schools for the next five years. **Table IV.J.3-2, Projected LAUSD School Capacity and Enrollment**, shows LAUSD's project capacity at each of these schools serving the Project vicinity. As reported by LAUSD no new school construction is planned in the Project Vicinity.⁶⁷

⁶⁷ Written correspondence with Rena Perez, Director of Master Planning & Demographics, LAUSD, July 12, 2017, **Appendix K** of this Draft EIR.

**Table IV.J.3-2
Projected LAUSD School Capacity and Enrollment**

School Name	Projected Capacity^b	Projected Enrollment^c	Projected Seating Overage/ (Shortage)^e	Overcrowded^f
9th Street Elementary School (K-5)	324	381	(57)	Yes
Hollenbeck Middle School (6-8)	1,351	1,270	81	No
School Choice Area Totals^a	3,102	3,498	(396)	Yes
Boyle Heights Academic Zone of Choice				
Boyle Heights STEM High School	323	-	-	-
Roosevelt Senior High School	1,708	-	-	-
Mendez Senior High School	1,071	-	-	-

Notes:

- a Schools and programs that are part of a "school choice area" pull enrollments from the school(s) that have resident areas, as defined by attendance boundaries. The individual school and calculated total capacities and enrollments for school choice areas are reported to show current and projected seating overage/shortage and overcrowding. If any of the school choice area schools is multi-track, then the service area is considered overcrowded.*
- b School planning capacity. Formulated from a baseline calculation of the number of eligible classrooms after implementing LAUSD operational goals and shifting to a 2-semester (1TRK) calendar. Includes capacity allocated to charter co-locations. Includes capacity for magnet program.*
- c Projected 5-year total number of students living in the school's attendance area and who are eligible to attend the school. Includes magnet centers.*
- d Projected seating overage or (shortage): equal to (projected capacity) – (projected enrollment)*
- e Projected overcrowding status of the school. The school will be considered overcrowded in the future if any of these conditions exist: 1) school remains on a multi-track calendar; 2) there is a seating shortage in the future; or 3) there is a seating overage of LESS THAN or EQUAL TO a "safety margin" of 20 seats in the future.'*

*Source: LAUSD Schools Enrollments and Capacities Report; Written correspondence with Rena Perez, Director of Master Planning & Demographics, LAUSD, July 12, 2017, **Appendix K** of this Draft EIR.*

(a) Schools Serving the Project Site

(i) 9th Street Elementary School

Ninth Street Elementary School is located at 835 Stanford Avenue, located approximately 1.2 miles west of the Project Site, and offers instruction for grades K-5 on a single-track calendar. As seen in **Table IV.J.3-1**, during the 2016-2017 academic year, 9th Street Elementary School had a total capacity of 360 students, a residential enrollment of 287 students, and an actual enrollment of 342 students. Therefore, based on 9th Street Elementary School's capacity of 360 students and its residential enrollment of 287 students, the school had available capacity of 73 seats during the 2016-2017 school year. When the actual enrollment number is used to calculate seating capacity (compared to current capacity), 9th Street Elementary School had an available capacity of 18 seats. The

school is not considered overcrowded based on both resident capacity (students living in the attendance area who are eligible to attend the school) and actual enrollment.⁶⁸

LAUSD's five-year projection for 9th Elementary School indicates that in the 2021-2022 academic year, the school is projected to have capacity for 324 students and a projected resident enrollment of 381 students, resulting in a shortage of 57 seats. Therefore, 9th Street Elementary School is projected to experience overcrowding in the future.⁶⁹

(ii) *Hollenbeck Middle School*

Hollenbeck Middle School is located at 2510 E 6th Street, approximately 1.5 miles east of the Project Site, and offers instruction for grades 6-8 on a single-track calendar. During the 2016-2017 academic year, Hollenbeck Middle School had a total capacity of 1,453 students, a residential enrollment of 1,370 students, and an actual enrollment of 1,073 students. Therefore, based on Hollenbeck Middle School's capacity of 1,453 students and its residential enrollment of 1,370 students, the school had an overage of 83 seats during the 2016-2017 school year. When the actual enrollment number is used to calculate seating capacity (compared to current capacity), Hollenbeck Middle School had an overage of 380 seats. Therefore, the school is not considered overcrowded based on resident capacity (students living in the attendance area who are eligible to attend the school), as well as actual enrollment.⁷⁰

LAUSD's five-year projection for Hollenbeck Middle School indicates that in the 2021-2022 academic year, the school is projected to have capacity for 1,351 students and a projected resident enrollment of 1,270 students, resulting in an available capacity of 81 seats. Therefore, Hollenbeck Middle School is not projected to experience overcrowding in the near future.⁷¹

(iii) *Boyle Heights Academic Zone of Choice High Schools*

In its vision to provide every student with a quality education and environment, the LAUSD has implemented a strategy called Zones of Choice to increase the number of personalized educational options available to resident high school students. Zones of choice are geographic areas that feature different high school options that offer college

⁶⁸ Written correspondence with Rena Perez, Director of Master Planning & Demographics, LAUSD, July 12, 2017, **Appendix K** of this Draft EIR.

⁶⁹ Written correspondence with Rena Perez, Director of Master Planning & Demographics, LAUSD, July 12, 2017, **Appendix K** of this Draft EIR.

⁷⁰ Written correspondence with Rena Perez, Director of Master Planning & Demographics, LAUSD, July 12, 2017, **Appendix K** of this Draft EIR.

⁷¹ Written correspondence with Rena Perez, Director of Master Planning & Demographics, LAUSD, July 12, 2017, **Appendix K** of this Draft EIR.

preparatory education and career preparation. The Boyle Heights Zone of Choice is located in the LAUSD's East Local District.⁷²

Students living in the Boyle Heights Academic Zone of Choice area are allowed to apply for one of three high schools, which include: Boyle Heights Science, Technology, Engineering and Math (STEM) High School located at 503 South Mott Street, approximately 1.7 miles east of the Project Site; Theodore Roosevelt High School located at 456 South Mathews Street, approximately 1.5 miles east of the Project Site; and, Felicitas & Gonzalo Mendez Senior High School located at 1200 Plaza Del Sol, approximately 1.4 miles north of the Project Site. Additionally, Roosevelt High School hosts a by-application magnet center, Roosevelt Math, Science and Technology Magnet.

During the 2016–2017 academic year, Boyle Heights Academic Zone of Choice high schools had a total capacity for 3,300 students, a residential enrollment of 3,688 students, and an actual enrollment of 2,682 students. Therefore, despite an actual enrollment of 2,682 students, which is lower than the capacity of 3,300 students, based on residential enrollment of 3,688 students, Boyle Heights Academic Zone of Choice high schools has a shortage of 388 seats and are considered overcrowded under existing conditions.⁷³

LAUSD's five-year projection (2021–2022) for Boyle Heights Academic Zone of Choice high schools indicates that the schools are projected to have a capacity for 3,102 students and a projected enrollment of 3,498 students, resulting in a shortage of 396 seats. Therefore, Boyle Heights Academic Zone of Choice high schools are projected to continue to experience overcrowding in the future.⁷⁴

(iv) *Metropolitan Continuation High School*

Metropolitan Continuation High School is located at 727 S. Wilson Street, approximately 0.3 mile southwest of the Project Site, and offers instruction for grades 9-12 grade on a single-track calendar. Metropolitan Continuation High School, which is a high school for students that have fallen behind on credits. Since enrollment is application based for continuation schools, overcrowding is not determined for these schools.⁷⁵

⁷² Written correspondence with Rena Perez, Director of Master Planning & Demographics, LAUSD, July 12, 2017, **Appendix K** of this Draft EIR.

⁷³ Written correspondence with Rena Perez, Director of Master Planning & Demographics, LAUSD, July 12, 2017, **Appendix K** of this Draft EIR.

⁷⁴ Written correspondence with Rena Perez, Director of Master Planning & Demographics, LAUSD, July 12, 2017, **Appendix K** of this Draft EIR.

⁷⁵ LAUSD Metropolitan Continuation High: <https://explorelausd.schoolmint.net/school-finder/schools/1549/metropolitan-continuation-high>, accessed August 2020.

(v) *Charter Schools*

Charter schools originated from the Charter School Act of 1992. Typically, a charter school is granted by the LAUSD Board of Education and approved by the State for a period of up to five years. LAUSD maintains two types of charter schools: conversion charters which are existing LAUSD schools that later become charters; and start-ups, which are charter schools that are newly created by any member of the public (e.g., educators, parents, foundations, and others). Charter schools are open to any student who wishes to attend, from any area within LAUSD. Currently, there are 277 charter schools (53 Affiliated, 224 Independent) under LAUSD jurisdictions, serving more than 138,000 students in grades kindergarten through 12th grade.⁷⁶

The charter schools within one-and-a-half miles of the Project Site (similar to distance to local public schools) include Arts in Action Community Middle School (grades 6th-7th), Extera Public School (K-8th), Jardin de la Infancia (K-1st), LIPP Los Angeles College Preparatory (5th-8th) Para Los Ninos Charter School (K-5th), Para Los Ninos Middle School (6th-8th), Puente Charter School (K) and SIATech Boyle Heights (11th-12th).⁷⁷ Based on information provided by LAUSD, charter schools do not have residential attendance boundaries and enrollment data for charter schools are not regularly reported to LAUSD. Thus, enrollment projections or capacity analyses provided by LAUSD are not inclusive of charter schools.

(vi) *Magnet Schools*

The option to attend “magnet” programs is also available to students living within the service boundaries of LAUSD. Magnet programs provide specialized curriculums and instructional approaches to attract a voluntary integration of students from a variety of neighborhoods. Magnet programs typically establish a unique focus such as gifted and talented, math and science, performing arts, or basic skills programs. Some magnet programs occupy entire school sites, while other magnet centers are located on regular school campuses with access to activities and experiences shared with the host school. Currently, there are 292 Magnet Programs located throughout the District.⁷⁸ Two of the Project Site service area schools offer magnet programs, which include: Hollenbeck Middle School (Law/Government/Police Academies); and Roosevelt High School (Science, Technology and Math). Since enrollment is application based for magnet schools, overcrowding is not determined for magnet schools.⁷⁹

⁷⁶ LAUSD Charter Schools Division.

⁷⁷ California Charter School Association, *Find a Charter School*.

⁷⁸ LAUSD Magnet Programs: <http://echoices.lausd.net/Magnet/Information>, accessed August 14, 2019.

⁷⁹ LAUSD Magnet Programs: <http://echoices.lausd.net/Magnet/Information>, accessed August 14, 2019.

(vii) *Private Schools*

In addition to publicly available schools, there are also a number of private schools in the Project vicinity that could potentially serve as alternatives to LAUSD schools. There are five private schools within one-mile of the Project Site including a high school, two K-8th schools and two preschools. Within three miles of the Project Site there are approximately 30 private schools.⁸⁰ These private facilities generally have smaller student populations and higher teacher-student ratios than public schools and are often parochial. The private school identification is provided for information purposes only and does not relate to LAUSD current or future enrollment capacity levels.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the *State CEQA Guidelines* the Project would have a significant impact related to schools if it would:

- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools.***

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the *2006 L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G Threshold questions.

The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate public school impacts:

- *The population increase resulting from the proposed project, based on the increase in residential units or square footage of non-residential floor area;*
- *The demand for school services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAUSD services (facilities, equipment and personnel) and the project's proportional contribution to the demand;*
- *Whether (and the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or*

⁸⁰ *Private School Review website.*

other actions which would create a temporary or permanent impact on the school(s); and

- *Whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).*

b) Methodology

The environmental impacts of the Project with respect to LAUSD school facilities are determined based on the enrollment and capacity of existing and reasonably foreseeable proposed LAUSD school facilities in the Project area, and the number of students that the Project would generate upon occupancy of the Project. Based on these projections, it is determined whether the Project would exceed the capacity of any existing or proposed LAUSD schools such that a new or expanded school would be needed.

c) Project Design Features

No specific Project Design Features are proposed with regard to schools.

d) Analysis of Project Impacts

As compared to the Project, the Flexibility Option would change the use of the second floor from residential to commercial, and would not otherwise change the Project's land uses or size. The overall commercial square footage provided would be increased by 22,493 square feet to 45,873 square feet and, in turn, there would be a reduction in the number of live/work units from 185 to 159 units and an increase in the number of bicycle spaces from 154 to 161. The overall building parameters would remain unchanged and the design, configuration, and operation of the Flexibility Option would be comparable to the Project. In the analysis of Project impacts presented below, where similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option would be essentially the same, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option. For those thresholds where numerical differences exist because of the differences in project parameters between the Project and Flexibility Option, the analysis is presented separately.

Threshold a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?

Numerical differences exist for these thresholds because of the differences in project parameters between the Project and Flexibility Option, therefore these analyses are presented separately.

(1) Impact Analysis

(a) *Project*

(i) *Construction*

The Project would involve the development of 185 live/work units and up to 23,380 square feet of commercial retail and art production uses. The Project would generate part-time and full-time jobs associated with construction of the Project between the start of construction and Project buildout. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Project. The construction industry differs from most other sectors in several ways:

- There is no regular place of work. Construction workers regularly commute to job sites that change many times over the course of a year. Their sometimes-lengthy daily commutes are facilitated by the off-peak starting and ending times of the typical construction workday.
- Many construction workers are highly specialized (e.g., crane operators, steel workers, masons) and move from job site to job site as dictated by the demand for their skills; and
- The work requirements of most construction projects are highly specialized. Workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process.

As a result, it is likely that the skilled workers anticipated to work on the Project already reside within the region and would not need to relocate as a result of employment. Furthermore, construction activity associated with the Project would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Project occupancy/buildout not result in an adverse physical change in the environment. The nearest school to the Project Site is Metropolitan High School, located at 727 Wilson Street, approximately 0.3 mile southwest of the Site. The construction of the Project would not require the closure of any vehicle travel lanes. Temporary closures of the sidewalks adjacent to the Project Site on Mateo Street and Imperial Street may be required during portions of the construction period. Furthermore, the anticipated

outbound haul route from the Project Site would be south on Mateo Street and east on E. 7th Street to the Golden State Freeway (I-5), and the anticipated inbound haul route to the Project Site would be exiting the I-10 from Exit 16A toward Santa Fe Avenue and Mateo Street, west onto E. 8th Street, and north onto Mateo Street. However, these temporary sidewalk closures and the anticipated haul routes would not adversely affect Metropolitan High School due to its location, which is located southwest of the Project Site. **Therefore, the construction employment generated by the Project would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts would not necessitate the expansion or construction of new school facilities, and therefore Project construction impacts would be less than significant; no mitigation measures are required.**

(ii) *Operation*

The Project would directly generate students through the construction of 185 new residential dwelling units. In addition, the Project's commercial retail component would generate students since employees of the commercial uses may relocate to the Project Site vicinity. As shown in **Table IV.J.3-3**, using the applicable LAUSD student generation rates for the Project's land uses, the Project would generate approximately 74 net new students, consisting of 41 elementary school students (Grades K-6), 11 middle school students (Grades 6–8), and 22 high school students (Grades 9–12).

**Table IV.J.3-3
Project Student Generation**

Land Use	Size	Students Generated ^a			
		Elementary (K-6)	Middle School (7-8)	High School (9-12)	Total
Existing Uses					
Warehouse	26,740 sf	11	3	7	21
Total Existing Students		11	3	7	21
Proposed Uses					
Live Work Units	185 du	42	11	24	77
Commercial	23,380 sf	8	2	4	14
Office and Art Production Related Uses	3,900 sf	2	1	1	4
Total Projected Students		52	14	29	95
Total Existing Students		11	3	7	21
Total Net New Students ^b		41	11	22	74
Note: du = dwelling unit; sf = square feet					
a Based on student generation factors provided in the 2018 Developer Fee Justification Study for Los Angeles Unified School District, March 2018. The ratio of students per employee in the District is 0.2249. The student generation rate of 0.00352 (employees per square foot) for "Industrial Business Parks" (Table 14) uses are applied for the warehouse uses (26,740 x 0.00352 x 0.2249 = 21.17), resulting in 21 (rounded) students. The student generation rate of 0.0027 (employees per square foot)					

**Table IV.J.3-3
Project Student Generation**

Project Student Generation ^a					
Land Use	Size	Students Generated ^a			
		Elementary (K-6)	Middle School (7-8)	High School (9-12)	Total
<p>for "Neighborhood Shopping Center" (Table 14) uses is applied for commercial uses ($23,380 \times 0.0027 \times 0.2249 = 14.20$), resulting in 14 (rounded) students. The student generation rate of 0.00479 (employees per square foot) for "Standard Commercial Office" (Table 14) uses is applied for office and art production related uses ($3,900 \times 0.00479 \times 0.2249 = 4.20$), resulting in 4 (rounded) employees. Since the LAUSD School Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the Project residential generation factors (i.e., approximately 55 percent elementary school, 14 percent middle school, and 31 percent high school). The following student generation rates are applied for residential uses: 0.2269 students per household (grades K-6) ($185 \times 0.2269=41.97$), resulting in 42 (rounded) students), 0.0611 students per household (grades 7-8) ($185 \times 0.0611=11.30$), resulting in 11 (rounded) students), and 0.1296 students per household (grades 9-12) ($185 \times 0.1296=23.98$), resulting in 24 (rounded) students) (Table 3).</p> <p><i>b</i> This is Total Projected Students minus Total Existing Students.</p> <p>Source: EcoTierra Consulting, Inc., August 2019.</p>					

Although it is very likely that some of the students generated by the Project would already be enrolled in LAUSD schools, for a conservative analysis, it is assumed that all 74 students generated by the Project would be new to the school district.

As previously discussed, students generated by the Project would attend 9th Street Elementary School and Hollenbeck Middle School with a choice of one of the three Boyle Heights Academic Zone of Choice (Boyle Heights S.T.E.M. High School, Theodore Roosevelt Senior High, or Felicitas and Gonzalo Mendez Senior High). Based on existing enrollment and capacity data from LAUSD presented in **Tables IV.J.3-1**, 9th Street Elementary School and Hollenbeck Middle School would have adequate capacity to accommodate the new students generated by the Project under existing conditions. Specifically, the addition of the 41 Project-generated elementary school students could be accommodated as the available capacity at 9th Street Elementary School is 73 seats. Hollenbeck Middle School has an available capacity of 83 seats and could, therefore, accommodate the additional 11 Project-generated middle school students. As indicated in **Table IV.J.3-1** the Boyle Heights Academic Zone of Choice area would not have adequate capacity to accommodate the 22 new students generated by the Project under existing conditions as there is an existing shortage of 388 seats.

In considering projected future capacity data from LAUSD presented in **Table IV.J.3-2**, only Hollenbeck Middle School is projected to have capacity to accommodate the Project generated students. It is projected that 9th Street Elementary would have a shortage of 57 seats, thus with the addition of 41 students generated by the Project, there would be a shortage of 98 seats. Hollenbeck Middle School is projected to have available capacity

of 81 seats which would accommodate the additional 11 Project-generated middle school students. The Boyle Heights Academic Zone of Choice high schools are projected to have a shortage of 396 seats and with the addition of the 22 Project-generated high school students there would be a shortage of 418 seats under projected future conditions.

It should be noted that the number of Project-generated students, who could attend LAUSD schools serving the Project Site, would likely be less than the estimate presented above due to the type of residential uses and options offered by LAUSD. Because of the nature of the proposed live/work units which are anticipated to be occupied by adults and their workspace and less likely households with school-aged children, the Project's projected student generation is likely to be less than estimated in the above analysis, which is based on LAUSD generation factors. The Project's large number of studio/one-bedroom (159 units) would generate few, if any, students. Additionally, the number of Project-generated students, who could attend LAUSD schools serving the Project Site, would likely be less than the estimate presented above because this analysis does not include LAUSD options that would allow students generated by the Project to enroll at other LAUSD schools located away from their home attendance area, or students who may enroll in private schools, charter schools, or participate in home-schooling. In addition, this analysis does not account for Project residents who may already reside in the school attendance boundaries and would move to the Project Site. Other LAUSD options, some of which are discussed above, that may be available to Project-generated students include the following:

1. Open enrollment that enables students anywhere within the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats;
2. Magnet schools and centers which are open to qualified students in the LAUSD;
3. The Permits With Transportation Program,⁸¹ which allows students to continue to go to the schools within the same feeder pattern of the school they were enrolled in from elementary through high school. The LAUSD provides transportation to all students enrolled in the Permits With Transportation Program regardless of where they live within the LAUSD;
4. Intra-district parent employment-related transfer permits that allow students to enroll in a school that serves the attendance area where the student's parent is regularly employed if there is adequate capacity available at the school;
5. Sibling permits that enable students to enroll in a school where a sibling is already enrolled; and
6. Childcare permits that allow students to enroll in a school that serves the attendance area where a younger sibling is cared for every day after school hours

⁸¹ *Los Angeles Unified School District, Permits with Transportation.*

by a known child care agency, private organization, or a verifiable child care provider.

Thus, the above analysis is considered conservative and likely overestimates the Project's actual potential to generate new students. Nonetheless, based on this conservative analysis the Project has the potential to impact schools with inadequate capacity. However, pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995, the payment of these fees is considered full and complete mitigation of Project-related school impacts. Therefore, payment of the applicable development school fees to the LAUSD would offset the potential impact of additional student enrollment at schools serving the Project Site. **Accordingly, with adherence to existing regulations, impacts on schools would be less than significant; no mitigation measures would be required.**

(b) Increased Commercial Flexibility Option

(i) Construction

The Flexibility Option would involve the development of 159 live/work units and up to 45,873 square feet of commercial retail and art production uses. Similar to the Project, the Flexibility Option would generate part-time and full-time jobs associated with construction of the building between the start of construction and buildout. However, due to the employment patterns of construction workers in Southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by the Flexibility Option. The construction industry differs from most other sectors in several ways:

- There is no regular place of work. Construction workers regularly commute to job sites that change many times over the course of a year. Their sometimes-lengthy daily commutes are facilitated by the off-peak starting and ending times of the typical construction workday.
- Many construction workers are highly specialized (e.g., crane operators, steel workers, masons) and move from job site to job site as dictated by the demand for their skills; and
- The work requirements of most construction projects are highly specialized. Workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process.

As a result, it is likely that the skilled workers anticipated to work on the Flexibility Option already reside within the region and would not need to relocate as a result of employment. Furthermore, construction activity associated with the Flexibility Option would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout not result in an adverse physical change in the environment. The nearest school to the Project Site is Metropolitan High School, located at 727 Wilson Street, approximately 0.3-mile southwest of the Site. The construction of the Project would not require the closure of any vehicle travel lanes. Temporary closures of the sidewalks adjacent to the Project Site on Mateo Street and Imperial Street may be required during portions of the construction period. Furthermore, the anticipated outbound haul route from the Project Site would be south on Mateo Street and east on E. 7th Street to the Golden State Freeway (I-5), and the anticipated inbound haul route to the Project Site would be exiting the I-10 from Exit 16A toward Santa Fe Avenue and Mateo Street, west onto E. 8th Street, and north onto Mateo Street. However, these temporary sidewalk closures and anticipated haul routes would not adversely affect Metropolitan High School due to its location, which located southwest of the Project Site. **Therefore, the construction employment generated by the Flexibility Option would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts would not necessitate the expansion or construction of new school facilities, and therefore Project construction impacts would be less than significant; no mitigation measures would be required.**

(ii) *Operation*

The Flexibility Option would directly generate students through the construction of 159 new residential dwelling units. In addition, similar to the Project, the Flexibility Option's commercial retail component would generate students since employees of the commercial uses may relocate to the Project Site vicinity. As shown in **Table IV.J.3-4**, using the applicable LAUSD student generation rates for the Flexibility Option's land uses, the Flexibility Option would generate approximately 77 net new students, consisting of 42 elementary school students (Grades K-6), 12 middle school students (Grades 6–8), and 23 high school students (Grades 9–12).

**Table IV.J.3-4
Increased Commercial Flexibility Option Student Generation**

Land Use	Size	Students Generated ^a			
		Elementary (K-6)	Middle School (7-8)	High School (9-12)	Total
Existing Uses					
Warehouse	26,740 sf	11	3	7	21
<i>Total Existing Students</i>		11	3	7	21
Proposed Uses					
Live Work Units	159 du	36	10	20	66
Commercial	45,873 sf	15	4	9	28
Office and Art Production Related Uses	3,600 sf	2	1	1	4
Total Projected Students		53	15	30	98
<i>Total Existing Students</i>		11	3	7	21
Total Net New Students^b		42	12	23	77
<i>Note: du = dwelling unit; sf = square feet</i>					
<i>a Based on student generation factors provided in the Level 1 – Developer Fee Justification Study for Los Angeles Unified School District, March 2018. The ratio of students per employee in the District is 0.2249. The student generation rate of 0.00352 (employees per square foot) for “Industrial Business Parks” (Table 14) uses are applied for the warehouse uses (26,740 x 0.00352 x 0.2249 = 21.17), resulting in 21 (rounded) students. The student generation rate of 0.0027 (employees per square foot) for “Neighborhood Shopping Center” (Table 14) uses is applied for commercial uses (45,873 x 0.0027 x 0.2249 = 27.86), resulting in 28 (rounded) students. The student generation rate of 0.00479 (employees per square foot) for “Standard Commercial Office” (Table 14) uses is applied for office and art production related uses (3,600 x 0.00479 x 0.2249 = 3.88), resulting in 4 (rounded) employees. Since the LAUSD School Fee Justification Study does not specify which grade levels students fall within for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the Flexibility Option residential generation factors (i.e., approximately 55 percent elementary school, 15 percent middle school, and 30 percent high school). The following student generation rates are applied for residential uses: 0.2269 students per household (grades K-6) (159 x 0.2269=36.08), resulting in 36 (rounded) students), 0.0611 students per household (grades 7-8) (159 x 0.0611=9.71), resulting in 10 (rounded) students), and 0.1296 students per household (grades 9-12) (159 x 0.1296=20.18), resulting in 20 (rounded) students) (Table 3).</i>					
<i>b This is Total Projected Students minus Total Existing Students.</i>					
<i>Source: EcoTierra Consulting, Inc., August 2019.</i>					

Similar to the Project, students generated by the Flexibility Option would attend 9th Street Elementary School and Hollenbeck Middle School with a choice of one of the three Boyle Heights Academic Zone of Choice (Boyle Heights S.T.E.M. High School, Theodore Roosevelt Senior High, or Felicitas and Gonzalo Mendez Senior High). Based on existing enrollment and capacity data from LAUSD presented in **Tables IV.J.3-1**, 9th Street Elementary School and Hollenbeck Middle School would have adequate capacity to accommodate the new students generated by the Flexibility Option under existing conditions. Specifically, the addition of the 42 Flexibility Option-generated elementary school students could be accommodated as the available capacity at 9th Street Elementary School is 73 seats. Hollenbeck Middle School has an available capacity of

83 seats and could, therefore, accommodate the additional 12 Flexibility Option-generated middle school students. As indicated in **Table IV.J.3-1** the Boyle Heights Academic Zone of Choice area would not have adequate capacity to accommodate the 24 new students generated by the Flexibility Option under existing conditions as there is an existing shortage of 388 seats.

In considering projected future capacity data from LAUSD presented in **Table IV.J.3-2**, only Hollenbeck Middle School is projected to have capacity to accommodate the Project generated students. It is projected that 9th Street Elementary would have a shortage of 57 seats, thus with the addition of 42 students generated by the Flexibility Option, there would be a shortage of 99 seats. Hollenbeck Middle School is projected to have available capacity of 81 seats which would accommodate the additional 12 generated middle school students. The Boyle Heights Academic Zone of Choice high schools are projected to have a shortage of 396 seats and with the addition of the 23 generated high school students there would be a shortage of 419 seats under projected future conditions.

Similar to the Project, because of the nature of the proposed live/work units which are anticipated to be occupied by adults and their workspace and less likely households with school-aged children, the Flexibility Option's projected student generation is likely to be less than estimated in the above analysis, which is based on LAUSD generation factors. The large number of studio/one-bedroom would generate few, if any, students. Additionally, the number of project-generated students, who could attend LAUSD schools serving the Project Site, would likely be less than the estimate presented above because this analysis does not include LAUSD options that would allow students generated by the Flexibility Option to enroll at other LAUSD schools located away from their home attendance area, or students who may enroll in private schools or participate in home-schooling. In addition, this analysis does not account for residents who may already reside in the school attendance boundaries and would move to the Project Site. Other LAUSD options, some of which are discussed above, that may be available to Flexibility Option-generated students include the following:

1. Open enrollment that enables students anywhere within the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats;
2. Magnet schools and centers which are open to qualified students in the LAUSD;
3. The Permits With Transportation Program,⁸² which allows students to continue to go to the schools within the same feeder pattern of the school they were enrolled in from elementary through high school. The LAUSD provides transportation to all students enrolled in the Permits With Transportation Program regardless of where they live within the LAUSD;

⁸² *Los Angeles Unified School District, Permits with Transportation.*

4. Intra-district parent employment-related transfer permits that allow students to enroll in a school that serves the attendance area where the student's parent is regularly employed if there is adequate capacity available at the school;
5. Sibling permits that enable students to enroll in a school where a sibling is already enrolled; and
6. Childcare permits that allow students to enroll in a school that serves the attendance area where a younger sibling is cared for every day after school hours by a known child care agency, private organization, or a verifiable child care provider.

Similar to the Project, the above analysis is considered conservative and likely overestimates the Flexibility Option's actual potential to generate new students. Nonetheless, the Flexibility Option, like the Project, has the potential to impact schools with inadequate capacity. However, pursuant to Senate Bill 50, the Project Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of the building permit. Pursuant to Government Code Section 65995, the payment of these fees is considered full and complete mitigation of project-related school impacts. Therefore, payment of the applicable development school fees to the LAUSD would offset the potential impact of additional student enrollment at schools serving the Project Site. **Accordingly, with adherence to existing regulations, impacts on schools would be less than significant no mitigation measures would be required.**

(2) Mitigation Measures

Project-level impacts for the Project and the Flexibility Option, with regard to school facilities, would be less than significant; no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts for the Project and the Flexibility Option, with regard to school facilities, would be less than significant without mitigation.

4. Cumulative Impacts

Numerical differences exist regarding the impact analysis and impact significance determination presented below because of the differences in project parameters between the Project and Flexibility Option, therefore these analyses are presented separately.

a) Impact Analysis

(1) Project

As identified in **Section III, Environmental Setting**, of this Draft EIR, there are 20 Related Projects located in the Project vicinity. Cumulative growth in the greater Project area includes specific known development projects, growth that may be projected as result of the land use designation and policy changes contained in the Community Plan Update, as well as general ambient growth projected to occur. As such, these Related Projects would have the potential to combine with the Project and cumulatively impact 9th Street Elementary School, Hollenbeck Middle School, and the Boyle Heights Academic Zone of Choice schools. All 20 Related Projects are located within attendance boundaries of at least one of the schools serving the Project Site. Based on the rates provided in the 2018 LAUSD Developer Fee Justification Study, the 20 Related Projects would generate a total of 6,258 students within the school attendance boundaries identified for this Project. As shown in **Table IV.J.3-5**, this total number would consist of 3,495 elementary school students, 824 middle school students, and 1,921 high school students.

As indicated above, the Project would generate a net total of approximately 74 new students, consisting of 41 elementary students, 11 middle school students, and 22 high school students. Therefore, as shown in **Table IV.J.3-5, Total Cumulative Student Generation (Project)**, the Project, in combination with the 20 applicable Related Projects, would have the potential to generate a cumulative total of 6,332 new school-aged students. This cumulative total would consist of 3,536 elementary students, 835 middle school students, and 1,943 high school students. Based on existing and projected enrollment and capacity data from LAUSD (refer to **Tables IV.J.3-1 and IV.J.3-2**, above), the schools serving the Project and the Related Projects would not have adequate capacity to serve the cumulative demand.

**Table IV.J.3-5
Total Cumulative Student Generation (Project)**

Land Use	Students Generated ^a			
	Elementary (K-6)	Middle School (7-8)	High School (9-12)	Total
Related Projects ^a	3,495	824	1,921	6,258
Project	41	11	22	74
Total Cumulative Students	3,536	835	1,943	6,332
<i>Note: du = dwelling unit; sf = square feet</i> <i>a A list of Related Projects is provided in Table III-1 of Section III, Environmental Setting, of this Draft EIR.</i> <i>b The tabulation of Related Projects' student generation is presented in Appendix J of this Draft EIR.</i> <i>Source: EcoTierra Consulting, Inc., April 2020.</i>				

Specifically, with the addition of students generated by the Project in combination with the Related Projects, 9th Street Elementary School would have a shortage of 3,463 seats (i.e., the existing excess capacity of 73 seats minus the 3,536 students generated by the Project and Related Projects). Hollenbeck Middle School would have a shortage of 752 seats (i.e., the existing excess capacity of 83 seats minus the 835 students generated by the Project and Related Projects). For the Boyle Heights Academic Zone of Choice high schools, there would be a shortage of 2,331 seats (i.e., the existing shortage of 388 seats plus the 1,943 students generated by the Project and Related Projects).

With regard to projected future capacity data from LAUSD, 9th Street Elementary School would have a shortage of 3,593 seats (i.e., the future shortage of 57 seats plus the 3,536 students generated by the Project and Related Projects). At Hollenbeck Middle School, there would be a shortage of 754 seats (i.e., the future excess capacity of 81 seats minus the 835 students generated by the Project and Related Projects). The Boyle Heights Academic Zone of Choice Schools would experience a shortage of 2,339 seats (i.e., the future shortage of 396 seats plus the 1,943 students generated by the Project and Related Projects).

Therefore, the students generated by the Project, in combination with the Related Projects located within the school attendance boundaries, would cause a shortage of seats when compared to existing conditions and projected school capacity at 9th Elementary, Hollenbeck Middle School and the Boyle Heights Academic Zone of Choice schools. This shortage would need to be addressed by LAUSD with expansion of these school facilities or build new schools with additional classrooms to accommodate future attendance. This degree of cumulative growth would substantially increase the demand for LAUSD services in the Project area. However, as previously discussed, the Project and Related Projects would be required to pay development impact fees pursuant to AB 50 to the LAUSD. Pursuant to Government Code Section 65995, the payment of these fees would be considered full and complete mitigation of school impacts generated by the Project and the Related Projects. **Therefore, the Project's incremental contribution towards school impacts would not be cumulatively considerable and impacts would be less than significant; no mitigation measures would be required.**

(2) Increased Commercial Flexibility Option

Similar to the Project cumulative discussion, of the 20 Related Projects, all 20 are located within attendance boundaries of at least one of the schools serving the Project Site. Based on the rates provided in the 2018 LAUSD Developer Fee Justification Study, the Related Projects would generate 3,495 elementary school students, 824 middle school students, and 1,921 high school students.

As indicated above, the Flexibility Option would generate a net total of approximately 77 new students, consisting of 42 elementary students, 12 middle school students, and 23 high school students. Therefore, as shown in **Table IV.J.3-6, Total Cumulative Student Generation (Flexibility Option)**, the Flexibility Option, in combination with the 20 Related Projects, would have the potential to generate a cumulative total of 6,335 new school-aged students. This cumulative total would consist of 3,537 elementary students, 836 middle school students, and 1,944 high school students. Based on existing and projected enrollment and capacity data from LAUSD (refer to **Tables IV.J.3-1** and **IV.J.3-2**, above), the schools serving the Flexibility Option and the Related Projects would not have adequate capacity to serve the cumulative demand.

**Table IV.J.3-6
Total Cumulative Student Generation (Flexibility Option)**

Land Use	Students Generated ^a			
	Elementary (K-6)	Middle School (7-8)	High School (9-12)	Total
Related Projects ^a	3,495	824	1,921	6,258
Project	42	12	23	77
Total Cumulative Students	3,537	836	1,944	6,335
<i>Note: du = dwelling unit; sf = square feet</i> <i>a A list of Related Projects is provided in Table III-1 of Section III, Environmental Setting, of this Draft EIR.</i> <i>b The tabulation of Related Projects' student generation is presented in Appendix J of this Draft EIR.</i> <i>Source: EcoTierra Consulting, Inc., April 2020.</i>				

Specifically, with the addition of students generated by the Flexibility Option in combination with the Related Projects, 9th Street Elementary School would have a shortage of 3,470 seats (i.e., the existing excess capacity of 67 seats minus the 3,537 students generated by the Flexibility Option and Related Projects). Hollenbeck Middle School would have a shortage of 755 seats (i.e., the existing excess capacity of 81 seats minus the 836 students generated by the Flexibility Option and Related Projects). For the Boyle Heights Academic Zone of Choice high schools, there would be a shortage of 2,332 seats (i.e., the existing shortage of 388 seats plus the 1,944 students generated by the Flexibility Option and Related Projects).

With regard to projected future capacity data from LAUSD, 9th Street Elementary School would have a shortage of 3,594 seats (i.e., the future shortage of 57 seats plus the 3,537 students generated by the Flexibility Option and Related Projects). At Hollenbeck Middle School, there would be a shortage of 755 seats (i.e., the future excess capacity of 81 seats minus the 836 students generated by the Flexibility Option and Related Projects). The Boyle Heights Academic Zone of Choice Schools would experience a shortage of 2,340 seats (i.e., the future shortage of 396 seats plus the 1,944 students generated by the Flexibility Option and Related Projects).

Therefore, the students generated by the Flexibility Option, in combination with the Related Projects located within the school attendance boundaries, would cause a shortage of seats when compared to existing conditions and projected school capacity at 9th Elementary, Hollenbeck Middle School and the Boyle Heights Academic Zone of Choice schools. This shortage would need to be addressed by LAUSD with expansion of these school facilities or build new schools with additional classrooms to accommodate future attendance. This degree of cumulative growth would substantially increase the demand for LAUSD services in the area. However, as previously discussed, the Flexibility Option and Related Projects would be required to pay development impact fees pursuant to AB 50 to the LASUD Developer Fee office. Pursuant to Government Code Section 65995, the payment of these fees would be considered full and complete mitigation of school impacts generated by the Related Projects. **Therefore, the Flexibility Option's incremental contribution towards school impacts would not be cumulatively considerable and impacts would be less than significant; no mitigation measures would be required.**

b) Mitigation Measures

Cumulative impacts related to schools for both the Project and Flexibility Option would be less than significant; no mitigation measures are required.

c) Level of Significance After Mitigation

Cumulative impacts related to schools for both the Project and Flexibility Option were determined to be less than significant without mitigation.

IV. Environmental Impact Analysis

J. Public Services

4. Parks and Recreation

1. Introduction

This subsection describes the potential impacts of the Project on parks and recreation services in the Project area. This subsection utilizes information from the following resources: the City of Los Angeles Department of Recreation and Parks (LADRP) website and written correspondence with Darry Ford, Senior Management Analyst I, Planning, Maintenance and Construction Branch, City of Los Angeles Department of Recreation and Parks, attached as **Appendix K** of this Draft EIR.

2. Environmental Setting

a) Regulatory Framework

(1) State

(a) Quimby Act

The Quimby Act (Section 66477 of the California Government Code) was enacted in 1965 to promote the availability of parks and open space in response to the need to preserve open space and provide parks and recreation facilities to accommodate growth in California. The Quimby Act gives cities and counties the authority to enact ordinances to require the dedication of land and/or payment of fees for parks and recreational facilities by developers of residential subdivisions as a condition of approval of a tentative tract map.⁸³ In accordance with the Quimby Act, the City adopted LAMC Section 17.12, which required developers of residential subdivisions to set aside and dedicate land for park and recreational uses and/or pay in-lieu fees for park improvements, pursuant to the Quimby Act. In addition, LAMC Section 12.33 extended these requirements to all multi-family residential use projects.

⁸³ *Los Angeles Department of Recreation and Parks website, Quimby.*

(2) Local

(a) *City of Los Angeles Charter*

Pursuant to City Charter Article V, Section 590, the LADRP was formed to establish, construct, maintain, operate, and control all parks, recreational facilities, museums, observatories, municipal auditoriums, sports centers, and all lands, waters, facilities, or equipment set aside or dedicated for recreational purposes and public enjoyment within the City of Los Angeles. The LADRP was established to promote public recreation and cooperate with other public agencies and organizations for that purpose.⁸⁴ The Board of Recreation and Parks Commissioners oversees the LADRP.

With regard to control and management of recreation and park lands, Section 594(c) of the City Charter provides that all lands set apart or dedicated as a public park shall forever remain for the use of the public inviolate. However, the Board of Recreation and Parks Commissioners may authorize the use of those lands for any park purpose and for other specified purposes.

(b) *General Plan Framework Element and Open Space Element*

The General Plan Framework Element (Framework), adopted in August 2001, includes park and open space policies that address recreational uses throughout the City. Specifically, Chapter 9 Infrastructure and Public Services, contains policies and objectives that address the provision of parks and open space within the City in the following three areas: (1) sufficient land area reserved for parks and recreation; (2) appropriate distribution of park and recreational facilities throughout the City; and (3) a full complement of park and recreational facility types to accommodate a wide variety of users.⁸⁵

The City's Open Space Element was prepared in June 1973 to provide an official guide to the City Planning Commission, the City Council, the Mayor, and other governmental agencies and interested citizens for the identification, preservation, conservation, and acquisition of open space in the City.⁸⁶ This document distinguishes open space areas as privately or publicly owned, and includes goals, objectives, policies, and programs directed towards the regulation of privately owned lands both for the benefit of the public as a whole, and for protection of individuals from the misuses of these lands. In addition, this document discusses the acquisition and use of publicly owned lands and recommends further implementation of studies and actions to guide development of open

⁸⁴ *City of Los Angeles Charter, Volume 1 Governance, Article V Departments.*

⁸⁵ *City of Los Angeles, The Citywide General Plan Framework Element, Chapter 9 Infrastructure and Public Services.*

⁸⁶ *City of Los Angeles Planning Department, Open Space Plan, June 1973.*

space in the City. Furthermore, in order to address the standards and criteria of identifying open space, this document describes various contextual factors that may affect space, including, but not limited to: recreation standards; scenic corridors; density and development; cultural or historical sites; safety, health, and social welfare; environmental and ecological balance; and unique sites.⁸⁷

The City's General Plan Open Space Element (Open Space Element) is currently undergoing revisions by the Department of City Planning.⁸⁸ From April through June 2017, the Department of City Planning convened four meetings for an Open Space Working Group for OurLA2040, the City's update to the General Plan. This group included open space practitioners that focused on four topics: Parks and Recreation, Wildlands, Waterways and Beaches, and Connections. As the update to the Open Space Element is underway, key preliminary themes have since been identified:⁸⁹

- Create a network of interconnected urban open spaces and green infrastructure
- Capitalize on opportunities to repurpose existing land for parks
- Strategically invest in improving equity and access to parks
- Promote citizen education, involvement, and stewardship
- Identify opportunities for climate-smart open space investments that deliver multiple environmental benefits

In conjunction with the working group meetings, an Open Space Vision Survey has been released to the public and will provide feedback that will be incorporated into the guiding principles for the Open Space Element. The OurLA2040 group also hosted four community workshops in October 2017, and an additional workshop was held in February 2018.⁹⁰ Until approval of the pending updates to the Open Space Element, the LADRP is operating under the guidance of the Public Recreation Plan (PRP), a portion Public Facilities and Services Element of the 1980 City of Los Angeles General Plan. The guidelines of the Public Recreation Plan are described below.

(c) *Public Recreation Plan*

Adopted in 1980 by the Los Angeles City Council, and most recently amended in September 2016, the PRP, establishes policies and standards related to parks, recreation facilities, and open space areas in the City. The PRP focuses on the development of

⁸⁷ City of Los Angeles Planning Department, *Open Space Plan*, June 1973.

⁸⁸ City of Los Angeles Planning Department, *General Plan Structure, Summary of the General Plan Structure*, Spring 2014.

⁸⁹ City of Los Angeles Planning Department, *OurLA2040, City of Los Angeles' General Plan Update, Open Space Working Group Summary*, August 2017.

⁹⁰ City of Los Angeles Planning Department, *OurLA2040, City of Los Angeles' General Plan Update, Open Space Working Group Summary*, August 2017.

physical facilities by emphasizing the provision of neighborhood and community recreation sites, including community buildings, gymnasiums, swimming pools, and tennis courts.⁹¹ The guidelines are not intended to set an upper limit for the areas of parks, recreational sites, or other types of open spaces. Instead, they are intended to provide the City with a flexible and broad range of options on how park expenditures can be spent across the City.

To a larger extent, the PRP focuses on facility planning in residential areas, as these areas generate the greatest demand for parks and recreational facilities. The PRP also establishes general locations for future facilities based on a proposed service radius and project population levels. The PRP identifies multiple park types based on size, type, intended users, and service radius size and categorizes parks into three groups: neighborhood, community, and regional. Regional parks are ideally greater than 50 acres in size, provide specialized recreation facilities and/or attractions (wilderness areas, campgrounds, lakes, golf courses, etc.), and have a service radius encompassing the entire Los Angeles region.⁹² Community parks are ideally 15 to 20 acres in size, provide park facilities servicing several neighborhoods (e.g., play fields, courts, swimming pools, etc.) and have a service radius of two miles.⁹³ Neighborhood parks are ideally five to 10 acres in size, are intended to serve residents of all ages in its immediate neighborhood (playfields, turfed picnic areas, etc.), are pedestrian-accessible without crossing a major arterial street or highway/freeway, and have a service radius of one mile.⁹⁴ Pocket parks and specialty parks are ideally one-half acre in size, intended to service a school or immediate surroundings, and have a service radius of approximately half a mile.⁹⁵

The desired long-range standard for local parks is based on a minimum of two acres per 1,000 persons for neighborhood parks with a service radius of 0.5 mile and a minimum of two acres per 1,000 persons for community parks with a service radius of two miles. Thus, the combined standard is four acres of neighborhood and community parkland per 1,000 persons.⁹⁶ However, the PRP also notes that these long-range standards may not be reached during the life of the plan and, therefore, includes more attainable short- and intermediate-range standards of one acre per 1,000 persons within a one mile service

⁹¹ *City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan, adopted, October 1980.*

⁹² *City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan, adopted, October 1980.*

⁹³ *City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan, adopted, October 1980.*

⁹⁴ *City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan, adopted, October 1980.*

⁹⁵ *City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan, adopted, October 1980.*

⁹⁶ *Letter correspondence with Darry Ford, Senior Management Analyst I, Planning, Maintenance and Construction Branch, City of Los Angeles Department of Recreation and Parks, August 14, 2017, Appendix K of this Draft EIR.*

radius for neighborhood parks and one acre per 1,000 persons within a two mile service radius for community parks, for a combined standard of two acres of neighborhood and community parkland per 1,000 persons. The PRP parkland standards are Citywide goals and do not constitute requirements for individual development projects.

(d) *Central City North Community Plan*

As discussed in **Section IV.G, Land Use and Planning**, of this Draft EIR, the Project Site is located within the planning boundary of the Central City North Community Plan, which guides land uses on the Project Site and in the surrounding areas. The current plan (adopted December 15, 2000) sets forth planning goals and objectives to maintain the community's distinctive character. Chapter III of the Central City North Community Plan, Land Use Policies and Programs, includes the following applicable goals, objectives and policies addressing open space, recreation, and park facilities:

Goal 4: Adequate recreation and park facilities which meet the needs of the residents in the Plan Area.

Objective 4-1: To conserve, maintain and better utilize existing recreation and park facilities which promote the recreational needs of the community.

Policy 4-1.1: Preserve the existing recreational facilities and parks.

Goal 5: A community with sufficient open space in balance with development to serve the recreational, environmental and health needs of the community and to protect environmental and aesthetic resources.

Objective 5-1: To preserve existing open space resources and where possible develop new open space.

Policy 5-1.1: Encourage the retention of passive and visual open space which provides a balance to the urban development of the Plan Area.

(e) *Citywide Community Needs Assessment*

In 2009, the LADRP completed a Citywide Community Needs Assessment (Assessment). The Assessment examined current and future recreation needs in the City as a first step in developing a Citywide park master plan and a five-year capital improvement plan. The overall objectives of the Assessment were to address the need for additional recreation facilities and parkland, identify improvements to facilities to meet current and future demands, prevent future maintenance issues, and offer positive alternatives to an increasingly dense and urbanized population.⁹⁷ The Assessment provides a number of key recommendations to be implemented through a detailed master planning process.

⁹⁷ *City of Los Angeles Department of Recreation and Parks, Final Report of the Citywide Community Needs Assessment, 2009.*

These recommendations include, but are not limited to, working with the Department of City Planning to modify the Park and Recreation Site Acquisition and Development Provisions set forth in Section 17.12 of the LAMC and update the PRP, developing an updated pricing and revenue plan to offset capital and operational costs, and implementing a land acquisition strategy involving developer impact agreements based on the standards for open space desired.⁹⁸

Based on the Assessment, the expectation of people's willingness to travel to parks and recreational facilities has also changed drastically since the time that the PRP was adopted in 1980. Specifically, 63 percent of survey respondents stated that they would travel at least one mile to visit a neighborhood park, and 38 percent of respondents would travel at least two miles. Additionally, 71 percent of respondents would travel at least two miles to visit a community park, and 37 percent of respondents would travel more than three miles to visit a community park. The willingness to travel farther to a park or recreational facility is in part due to the increased accessibility of public transit, as it is now easy and convenient for people to access parks farther than 0.5 mile from their place of residence.⁹⁹

Based on the existing supply of park and recreational facilities, the *Citywide Community-Wide Needs Assessment* recommended a service level of 10.60 acres of park land per 1,000 persons Citywide, including 0.10 acre of mini parks (i.e., parks less than one acre in size), 1.50 acres of neighborhood parks, two acres of community parks, and six acres of regional and large urban parks.¹⁰⁰

(f) *Los Angeles Municipal Code*

LAMC Section 12.21-G identifies open space requirements for projects, and defines usable open space for the purpose of meeting the requirements. Usable open space is defined as areas designated for active or passive recreation and may consist of private and/or common areas. Common open space areas must be readily accessible to all residents of the site and constitute at least 50 percent of the total required usable open space. Common open space areas can incorporate recreational amenities such as swimming pools, spas, children's play areas, and sitting areas. A minimum of 25 percent of the common open space area must be planted with ground cover, shrubs, or trees. In addition, indoor recreation amenities cannot constitute more than 25 percent of the total required usable open space. Private open space is defined as area that is contiguous to and immediately accessible from an individual dwelling unit and which contains a

⁹⁸ *City of Los Angeles Department of Recreation and Parks, Final Report of the Citywide Community Needs Assessment, 2009.*

⁹⁹ *City of Los Angeles Department of Recreation and Parks, Final Report of the Citywide Community Needs Assessment, 2009.*

¹⁰⁰ *LADRP, 2009 Citywide Community Needs Assessment, Executive Summary.*

minimum of 50 square feet, of which no more than 50 square feet per dwelling unit is counted toward the total required usable open space. Private open space may not have a dimension of less than 6 feet in any direction.

LAMC Section 12.21-G requires that all residential developments containing six or more dwelling units on a lot provide, at a minimum, the following usable open space area per dwelling unit: 100 square feet for each unit having less than three habitable rooms, 125 square feet for each unit having three habitable rooms, and 175 square feet for each unit having more than three habitable rooms.

On September 7, 2016, the City of Los Angeles adopted Ordinance 184,505, the Parks Dedication and Fee Update Ordinance. The ordinance went into effect on January 11, 2017 and applies to all new residential dwelling units and joint living/work quarters, with the exception of affordable housing units and second dwelling units in single-family zones. The aim of the Ordinance is to increase the opportunities for park and recreation space and expand the fee program beyond those projects requiring a subdivision map to include a park linkage fee for all net new residential units. The Ordinance increases Quimby fees, provides a new impact fee for non-subdivision projects, eliminates the deferral of park fees for market rate projects that include residential units, increases the fee spending radii from the site from which the fee is collected, provides for early City consultation for subdivision projects or projects with over 50 units in order to identify means to dedicate land for park space, and updates the provisions for credits against park fees. The Ordinance provides that any project that has acquired vested rights under LAMC Section 12.26-A.3 prior to the effective date of the Ordinance, and/or has an approved vesting tentative map pursuant to LAMC Sections 17.01 and 17.15, the application for which has been deemed complete prior to the effective date of the Ordinance, shall not be subject to the park fees set forth in the Ordinance. The Project's entitlement applications were approved in October 20, 2016, prior to January 11, 2017, and thus, the Project is not subject to the park fee provisions of the Ordinance.

LAMC Section 17.12, authorized under the Quimby Act, requires developers of residential subdivisions to set aside and dedicate land for park and recreational uses and/or pay in-lieu fees for park improvements. The area of parkland within a subdivision that is required to be dedicated is determined by the maximum density permitted by the zone within which the development is located. Alternately, fees for park improvements may be paid to the DRP in lieu of the dedication of all or a portion of the land. The in-lieu fees are calculated per dwelling unit to be constructed based on the zoning of the project site and must be paid prior to the issuance of building permits. These fees are adjusted annually.

Further, LAMC Section 17.12 allows recreation areas developed on a project site that are for use by the project's residents to be credited against the project's land dedication requirements. Recreational areas that qualify under this provision of Section 17.12

include, in part, swimming pools and spas (when the spas are an integral part of a pool complex) and children's play areas with playground equipment comparable in type and quality to those found in City parks. Furthermore, the recreational areas proposed as part of a project must meet the following standards in order to be credited against the requirement for land dedication: (1) each facility is available for use by all residents of a project; and (2) the area and the facilities satisfy the park and recreation needs of a project so as to reduce that project's need for public park and recreation facilities. In addition, Section 17.12 provides that low intensity development recreation areas (hereafter referred to a "common open space") may be credited against the project's land dedication requirement, if approved by the City's Advisory Agency.

Similar to LAMC Section 17.12 described above, LAMC Section 12.33 requires a developer of multiple residential uses, for which a zone change is required, to dedicate land for park and recreational uses and/or pay in-lieu fees for park improvements. These fees (also known as Finn fees), are subject to the same restrictions, conditions, exemptions, and credits as under LAMC Section 17.12.

In addition, pursuant to LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax), the City imposes a tax of \$200 per dwelling unit on the construction of all new dwelling units and modification of existing dwelling units to be paid to the Department of Building and Safety. These taxes are placed into a "Park and Recreational Sites and Facilities Fund" to be used exclusively for the acquisition and development of park and recreational sites. As provided in LAMC Section 21.10.3(b), if a developer has already paid Quimby/Finn fees and/or dedicated parkland or recreational facilities pursuant to LAMC Sections 17.12 or 12.33, the Dwelling Unit Construction Tax required is reduced accordingly.

b) Existing Conditions

The LADRP is responsible for the establishing, operating, managing, and maintaining all municipally owned and operated recreation and park facilities within the City. These facilities include parks, swimming pools, public golf courses, recreation centers, museums, youth camps, tennis courts, sports programs, and programs for senior citizens. The LADRP also supervises construction of new facilities and improvements to existing ones. Currently the LADRP maintains over 16,000 acres of parkland between within approximately 444 regional, community, and neighborhood 422 playgrounds, 321 tennis courts, 187 summer youth camps, 184 recreational centers, 72 fitness areas, 62 swimming pools and aquatic centers, 30 senior centers, 26 skate parks, 13 municipal golf courses, 12 museums, nine dog parks and help support the Summer Night Lights gang reduction and community intervention program. LADRP oversees Griffith Park (including historic and venues such as the Greek Theater and Griffith Observatory) as well as supports the City's urban wilderness and open spaces by maintaining and caring for the

park urban tree canopy, 92 miles of hiking trails, 13 lakes, Venice Beach, and the Cabrillo Marine Aquarium.¹⁰¹

According to the LADRP, parks within the surrounding community are heavily utilized and often overburdened. However, there are several types of parks and recreational facilities that are considered community and neighborhood parks within two miles of the Project Site. **Table IV.J.4-1, Parks and Recreation Facilities Within a 2-Mile Radius of the Project Site**, lists the type of park, amenities, and approximate driving distance from the Project Site for these public parks and recreational facilities.

**Table IV.J.4-1
Parks and Recreation Facilities Within a 2-Mile Radius of the Project Site**

Map No. ^a	Facility Name and Address	Distance from Project Site (miles) ^b	Type of Facility	Size (acres)	Amenities
Pocket Park (within 0.5 mile of Project Site)					
1	Arts District Park 501 S. Hewitt, LA 90013	0.5	Pocket Park	0.5	Children's Play Area, Picnic Area
2	Arts District Dog Park 1004 E. 4 th Street LA 90013	0.5	Dog Park	0.5	Dog Facilities
TOTAL ACREAGE – POCKET PARKS				1.0	
Neighborhood Park (within 2 mile of Project Site)					
3	Gladys Park 6 th and Gladys, LA 90021	0.8	Park	0.34	Basketball Courts, Outdoor Exercise Equipment, Picnic Tables
4	San Julian Park 312 E. 5 th Street, LA 90013	1.2	Park	0.29	Grass, Benches
5	Spring Street Park 428 South Spring Street LA 90013	1.5	Park	0.81	Children's Play area, Walking Paths, Benches, Grass Area
6	Prospect Park 612 N. Enchandia St. LA 90033	2	Park	2.71	Children's Playground, Benches, Grass Area
7	Grand Hope Park 900 South Hope St. LA 90015	2	Park	2.31	Grass, Children's Play Area, Picnic Tables
TOTAL ACREAGE - NEIGHBORHOOD PARKS				6.46	
Community Park (within 2 miles of Project Site)					
8	Aliso Pico Recreation Center 370 S. Clarence St. LA 90033	1.1	Recreation Center	4.47	Children's Play Area, Auditorium, Basketball Courts, Indoor Gym (w/o Weights), Volleyball Courts, Baseball Diamond, Tennis Courts, Community Room, Computer Labs, Cultural Educational Facility, Kitchens, Multi-Purpose Sports Field, , Music Room
9	Boyle Heights Sports Center 933 S. Mott, LA 90023	1.1	Sports Complex	7.22	Barbecue Pits, Baseball Diamonds, Basketball Courts, Children's Play Area, Community Room, Picnic Tables, Track Field, Jogging Path, Multipurpose Sports Field,

¹⁰¹ Los Angeles Department of Recreation and Parks website, *Who We Are*.

**Table IV.J.4-1
Parks and Recreation Facilities Within a 2-Mile Radius of the Project Site**

Map No.^a	Facility Name and Address	Distance from Project Site (miles)^b	Type of Facility	Size (acres)	Amenities
10	Hollenbeck Park, Recreation Center, Lake & Skate Park 415 S. Saint Louis St. LA 90033	1.1	Park, Recreation Center, Lake, Skate Park	20.47	Barbecue Pits, Children's Play Area, Picnic Tables, Auditorium, Community Room, Band shell, Kitchen, Outdoor Fitness Equipment, Preschool, Lake, Youth/ Adult Programs, Fishing, Skating Amenities
11	Pecan Recreation Center 145 S. Pecan Street, LA 90033	1.2	Recreation Center	4.28	Basketball courts, Children's' Play Area, Community Room, Handball Courts, Picnic Tables, Restrooms, Volleyball Courts, Multi-purpose Sports Field, Baseball Diamond
12	Pecan Pool 120 S. Gless Street, LA 90033	1.3	Pool	N/A	Outdoor, Pool, Summer Programs, Teams, Lessons
13	Roosevelt Pool 456 S. Mathews St., LA 90033	1.5	Pool	1.5	Year Round Pool, Youth and Adult Programs, Teams, Lessons, Classes
14	Los Angeles Plaza Park 125 Paseo de la Plaza LA 90012	1.6	Park	N/A	Grass Area
15	Pershing Square Park 532 S. Olive St. LA 90013	1.7	Park	4.4	Stage and Amphitheater, Community Room, Ice Skating Rink (Seasonal), Grass Area, Benches, Walking Paths, Children's Play Area, Pet Area
16	City Hall Park Center 200 N. Main Street LA 90012	1.8	Park	1.92	Grass Area
17	Monsignor Ramon Garcia Recreation Center 1016 S. Fresno Street, LA 90023	1.8	Recreation Center	5.69	Auditorium, Barbecue Pits, Baseball Diamond, Basketball Courts, Children's Play Area, Community Room, Picnic Tables, Kitchen, Multipurpose Sports Field, Stage,
18	Central Park Recreation Center 1357 E. 22 nd Street, LA 90011	2	Recreation Center/ Summer Pool	1.65	Basketball Courts, Children's Play Area, Kitchen, Stage, Preschool Room, Computer Lab, Sports Fields, Youth and Teen Programs
19	Costello Senior Citizen Center 3121 E. Olympic Blvd. LA 90023	2	Senior Citizen Center	N/A	Community Room, Kitchen, Stage
20	Lou Costello Recreation Center 3141 E. Olympic Blvd. LA 90023	2	Recreation Center/ Summer Pool	3.46	Auditorium, Gymnasium, Music Room, Preschool Room, Stage, Outdoor Gym, Basketball Courts, Baseball Diamonds (Unlighted), Children's Play Area, Picnic Tables, Pool
21	Boyle Heights Sr. Citizen Center 2839 E. 3 rd Street, LA 90023	2	Sr. Citizen Center	N/A	Auditorium, Club Room(s), Kitchen, Stage
22	State Street Recreation Center 716 N. State Street, LA 90033	2	Recreation Center	2.62	Auditorium, Baseball Diamond, Basketball Courts, Children's Play Area, Community Room, Kitchen, Multipurpose Sports Field, Stage,

**Table IV.J.4-1
Parks and Recreation Facilities Within a 2-Mile Radius of the Project Site**

Map No. ^a	Facility Name and Address	Distance from Project Site (miles) ^b	Type of Facility	Size (acres)	Amenities
					Youth and Adult, classes, Teams, Lessons
TOTAL ACREAGE – COMMUNITY PARKS				55.76	
<i>a Map numbers correspond with map Figure IV.J.4-1</i> <i>b Measured in driving/walking distances using Google Maps.</i> <i>N/A Data Not Available</i>					
<i>Source: City of Los Angeles, Department of Recreation and Parks Facility Locator, www.laparks.org, accessed June 1, 2018; Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment, May 3, 2016.</i> <i>http://tpc.maps.arcgis.com/apps/MapJournal/index.html?appid=6f8962df9e9446babb35f28fa8d1c23a accessed June 1, 2018</i> <i>Written correspondence Letter correspondence with Darry Ford, Senior Management Analyst I, Planning, Maintenance and Construction Branch, City of Los Angeles Department of Recreation and Parks, August 14, 2017, Appendix K of this Draft EIR.</i>					

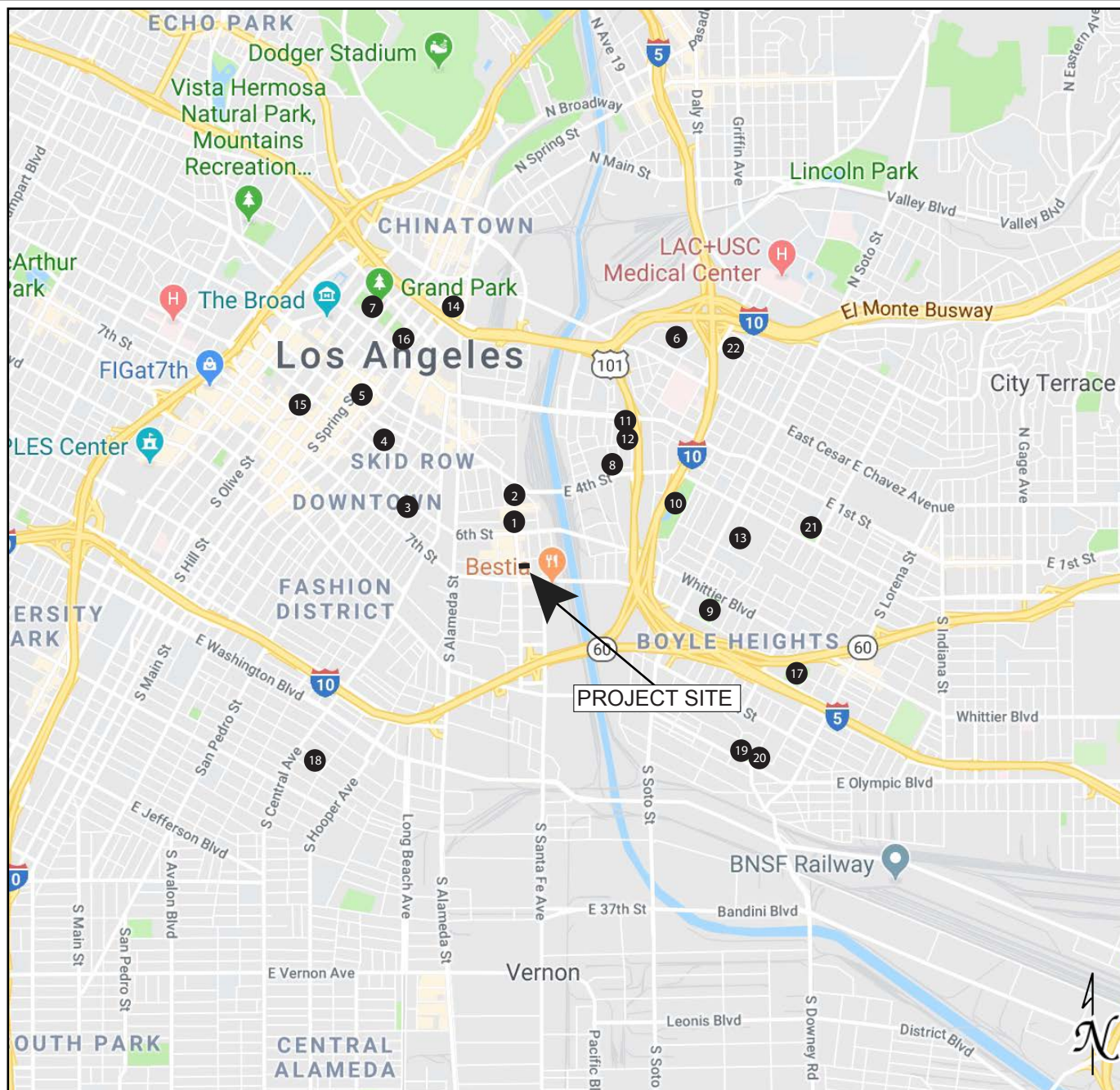
In addition, to the parks listed above, a park at 1st and Broadway (an expansion of Grand Park) is in development and will be located at 217 West 1st Street approximately 1.8 miles northwest of the Project Site and will contain 1.96 acres, and the 6th Street Park, Arts and Connectivity Project (PARC Project) is in development and will contain 12 acres of public park.¹⁰² Grand Park, located approximately 1.8 miles northwest of the Project Site is operated by Los Angeles County Music Center rather than the LADRP. Grand Park offers 12 acres of park and recreational space for gatherings, entertainment, and leisure activities that likely attract Central City North residents.¹⁰³

Figure IV.J-4, Park Location Map, shows the location of the parks identified in **Table IV.J.4-1** that are within a two-mile radius of the Project Site. In addition to the 22 recreational facilities within two miles of the Project Site there are six community parks located within a two- to three-mile radius LADRP has identified an additional 29 community parks within an approximate five-mile radius and 25 regional parks/facilities (including 10 individually identified facilities within Griffith Park) located within a 10-mile radius.¹⁰⁴

¹⁰² City of Los Angeles, Bureau of Engineering, 6th Street Park, Arts, River, and Connectivity Improvement Project.

¹⁰³ County of Los Angeles, Grand Park.

¹⁰⁴ Written correspondence Letter correspondence with Darry Ford, Senior Management Analyst I, Planning, Maintenance and Construction Branch, City of Los Angeles Department of Recreation and Parks, August 14, 2017, **Appendix K** of this Draft EIR.



Source: Google Maps, August 2018.

1. **Arts District Park:** 501 S. Hewitt
2. **Arts District Dog Park:** 1004 E. 4th St.
3. **Gladys Park:** 6th and Gladys
4. **San Julian Park:** 312 E. 5th Street
5. **Spring Street Park:** 428 South Spring St.
6. **Prospect Park:** 612 N. Enchandia St.
7. **Grand Hope Park:** 900 South Hope St.
8. **Aliso Pico Recreation Center:**
370 S. Clarence St
9. **Boyle Heights Sports Center:** 933 S. Mott
10. **Hollenbeck Park, Recreation Center, Lake & Skate Park:** 415 S. Saint Louis St.
11. **Pecan Recreation Center:** 145 S. Pecan St.
12. **Pecan Pool:** 120 S. Gless St.
13. **Roosevelt Pool:** 456 S. Mathews St.
14. **Los Angeles Plaza Park:**
125 Paseo de la Plaza
15. **Pershing Square Park :** 532 S. Olive St.
16. **City Hall Park Center:** 200 N. Main St.
17. **Monsignor Ramon Garcia Recreation Center:** 1016 S. Fresno St.
18. **Central Park Recreation Center:**
1357 E. 22nd St.
19. **Costello Senior Citizen Center:**
3121 E. Olympic Blvd.
20. **Lou Costello Recreation Center:**
3141 E. Olympic Blvd.
21. **Boyle Heights Sr. Citizen Center:**
2839 E. 3rd St.
22. **State Street Recreation Center:**
716 N. State St.

Figure IV.J.4-1
Park Location Map

The Project is located in an area of the City that is below the City's standard for neighborhood and community park acreage. As previously stated, the City's standard ratio of neighborhood and community parks to population is four acres per 1,000 people, pursuant to the PRP. The Central City North Community Plan Area, which includes the project area, has 0.84 acres of neighborhood and community park acreage per 1,000 people. The facilities in this area with active recreational features are very heavily used.¹⁰⁵

While there are no regional parks within the Central City North Community Plan area, Regional Parks have a service radius encompassing the entire Los Angeles region. The closest City regional parks, Ernest E. Debs Regional Park and Griffith Park are within six and 10 miles of the Project Site, respectively. The 282-acre Ernest E. Debs Regional Park offers trails in an urban wilderness preservation area, community and gathering areas, ball fields, and a nature center managed by the Audubon Society.^{106,107} The 4,511-acre Griffith Park, one of the largest municipal parks in the U.S. and the largest historic landmark in the City, offers numerous family attractions, an assortment of educational and cultural institutions, and more than 70 miles of hiking and equestrian trails.¹⁰⁸ Furthermore, as previously mentioned, the 6th Street Park, Arts and Connectivity Project (PARC Project) is in development and will contain 12 acres of public park.¹⁰⁹ The PARC Project includes the creation of public recreational space in areas underneath and adjacent to the Sixth Street Viaduct, including park space between the Los Angeles River and Mateo Street in the Arts District.

For a comprehensive list refer to the correspondence from the LADRP in **Appendix K**, Public Service Correspondence, of this Draft EIR.

3. Project Impacts

a) Thresholds of Significance

In accordance with guidance provided in Appendix G to the *State CEQA Guidelines*, the Project could have a significant impact if it were to:

- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental**

¹⁰⁵ Letter correspondence with Darry Ford, Senior Management Analyst I, Planning, Maintenance and Construction Branch, City of Los Angeles Department of Recreation and Parks, August 14, 2017, **Appendix K** to this Draft EIR.

¹⁰⁶ Debs Park Advisory Board, Framework Plan, Introduction.

¹⁰⁷ Audubon Center at Debs Park, Visit Our Center.

¹⁰⁸ City of Los Angeles Department of Recreation and Parks, Griffith Park, Map & Guide, 2016.

¹⁰⁹ City of Los Angeles, Bureau of Engineering, 6th Street Park, Arts, River, and Connectivity Improvement Project.

impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks; or

- b) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or*
- c) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.*

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the *2006 L.A. CEQA Thresholds Guide*, as appropriate, to assist in answering the Appendix G Threshold questions.

The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate parks and recreation impacts:

- *The net population increase resulting from the proposed project;*
- *The demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and*
- *Whether the project includes features that would reduce the demand for recreation and park services (e.g., on-site recreation facilities, land dedication or direct financial support to the Department of Recreation and Parks).*

b) Methodology

The environmental impacts of a project with respect to parks and recreational facilities are determined based on the ability of existing parks and recreational facilities in a Project area to accommodate a project's needs for such facilities. This is calculated based on the City's recommended ratios for parkland to population as well as project-specific recommendations of the LADRP. Based on this evaluation, a determination is made whether a project would create substantial demands on existing parks and recreational facilities such that new or expanded parks and recreational facilities would be needed either on-site or off-site.

c) Project Design Features

No specific Project Design Features beyond the open space and recreation features described in **Section II, Project Description**, of this Draft EIR are proposed with regard to parks and recreation.

d) Analysis of Project Impacts

As compared to the Project, the Flexibility Option would change the use of the second floor from residential to commercial, and would not otherwise change the Project's land uses or size. The overall commercial square footage provided would be increased by 22,493 square feet to 45,873 square feet and, in turn, there would be a reduction in the number of live/work units from 185 to 159 units and an increase in the number of bicycle spaces from 154 to 161. The overall building parameters would remain unchanged and the design, configuration, and operation of the Flexibility Option would be comparable to the Project. In the analysis of Project impacts presented below, where similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option would be essentially the same, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option. For those thresholds where numerical differences exist because of the differences in project parameters between the Project and Flexibility Option, the analysis is presented separately.

- Threshold a)** *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?*
- Threshold b)** *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*
- Threshold c)** *Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

Numerical differences exist for these thresholds because of the differences in project parameters between the Project and Flexibility Option, therefore these analyses are presented separately.

(1) Impact Analysis

(a) Project

(i) Construction

Construction of the Project would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in the Los Angeles and Southern California area, where they move from construction site to construction site, and as the length of construction jobs is varied, the likelihood that construction workers would relocate their households as a consequence of working on the Project is negligible. Therefore, the construction workers associated with the Project would not result in a notable increase in the residential population of the Project area, or a corresponding permanent demand for parks and recreation facilities in the vicinity of the Project Site.

During Project construction, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. There is a potential for construction workers to spend their lunch breaks at the parks and recreational facilities near the Project Site, specifically the Arts District Park, approximately 0.5 mile north of the Project Site. However, any resulting increase in the use of nearby parks and recreational facilities would be temporary and would be expected to occur during off-peak park usage hours (i.e., when most potential park patrons are at work or school). Furthermore, it is unlikely that workers would utilize parks and recreational facilities beyond a 0.5-mile radius from the Project Site (all other parks as shown in **Table IV.J.4-1** above), as lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the typically allotted time (e.g., 30 to 60 minutes). Therefore, any resulting increase, if any, in the use of such parks and recreational facilities would be temporary and negligible. **Therefore, impacts on parks and recreational facilities during Project construction would be less than significant; no mitigation measures would be required.**

(ii) Operation

(a) Public Recreation Plan

As previously discussed, the PRP's desired long-range standard for local parks is based on a minimum of two acres per 1,000 persons for neighborhood parks with a service radius of 0.5 mile, a minimum of two acres per 1,000 persons for community parks with a service radius of two miles and six acres per 1,000 persons of regional parkland. However, the PRP also notes that the long range standards may not be reached during

the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of one acre per 1,000 persons within a one-mile service radius for neighborhood parks and one acre per 1,000 persons within a two-mile service radius for community parks (the PRP does not provide a short-or intermediate-range standard for regional parks). As stated above, the Central City North Community Plan Area currently does not meet the PRP's guidelines.

Based on the Project's 448 estimated new residents (refer to **Section IV.I, Population and Housing**, of this Draft EIR) and the PRP's long-range standards, the Project would generate demand for 0.896 acres each of neighborhood and community parkland and 2.69 acres of regional parkland for a total of 3.59 acres, meeting the PRP's long-range standards. In accordance with the Public Recreation Plan's more attainable short- and intermediate-range standards, the Project would generate demand for 0.448 acre each of neighborhood and community parks and facilities in addition to the 2.69 acres of regional parkland for a total of 3.14 acres.

The Project would include a total of approximately 15,320 square feet (0.35 acre) of useable open space which would fall short of the PRP Recreation Plan's long-, intermediate- and short-range guidelines for neighborhood sites and facilities, community sites and facilities, and regional recreational sites and facilities. However, as previously stated, the Public Recreation Plan parkland guidelines are Citywide goals and do not constitute requirements for individual development projects. Furthermore, the intent of the Public PRP's parkland standards would be met through compliance with state law as enforced through applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces. As previously discussed, such requirements include payment of applicable Quimby/Finn fees¹¹⁰ and/or the Dwelling Unit Construction Tax¹¹¹ to the City.

(b) Los Angeles Municipal Code

The Project's required amount of open space was calculated pursuant to LAMC Section 12.21-G,2, based on the total number of units. As shown in **Table IV.J.4-2**, the Project is required to provide approximately 19,150 square feet of open space,¹¹² As set forth in LAMC Section 12.22-A,25, because the Project is setting aside 11 percent of its proposed units (approximately 20 live/work units) for Very Low Income Households, the Project qualifies for "on-menu" incentives.¹¹³ Specifically, the Project Applicant is requesting to

¹¹⁰ LAMC Sections 12.33 and 17.12.

¹¹¹ LAMC Section 21.10.3(a)(1).

¹¹² Project: 159 studio and one-bedroom live/work units at 100 square feet of open space per unit equals 15,900 square feet, plus 26 two-bedroom live/work units at 125 square feet of open space per unit equals 3,250 square feet. (15,900 + 3,250 = 19,150).

¹¹³ "On-menu" incentives refer to those incentives that are specifically enumerated in the City's Density Bonus Ordinance.

utilize an on-menu incentive for up to a 20 percent reduction in the amount of required open space. After accounting for the requested open space reduction, the Project would be required to provide approximately 15,320 square feet of open space.

**Table IV.J.4-2
Project Open Space Summary**

Land Use	Amount
Open Space	
Private Open Space	2,850 sf
Outdoor Common Open Space	9,290 sf
Indoor Common Open Space	3,180 sf
Total Open Space	15,320 sf
159 units x 100 square feet	15,900 sf
26 units x 125 square feet	3,250 sf
Required Open Space Without Density Bonus	19,150 sf
Required Open Space With Density Bonus	15,320 sf
<i>du = dwelling units; sf = square feet</i>	
<i>Source: HansonLA Architecture, November 2018.</i>	

The Project includes 185 residential units and will provide common open space in conformance with LAMC Section 12.21G. The Project would provide a variety of active and passive open space and recreational amenities to serve the needs of Project residents and visitors. The open space and residential amenities would be located in several distinct areas, generally located on the ground, second, and eighth level. As identified in **Section II, Project Description**, of this Draft EIR, the Project would include 15,320 square feet of usable open space of which approximately 9,290 square feet would be outdoor common space, 3,180 square feet would be indoor common space and 2,850 square feet of private open space. The Project's various amenities would include a swimming pool and spa, fitness and recreation rooms, courtyard with planters for cultivating fruits and vegetables, arts and production space, yoga deck, outside dining area, and terraces. In addition, a number of live/work units would include private balconies. The Project would also provide a minimum of 46 trees in the common outdoor spaces.

In addition to the Project's provision of open space, to alleviate the Project's demand on City parks and recreational facilities, the Applicant would be required to dedicate parkland or pay Quimby/Finn fees to the City to satisfy its obligations under LAMC Sections 17.12 and 12.33, as discussed under the Regulatory Framework subsection above. Therefore, the Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities.

(c) Central City North Community Plan

The Project would support the objectives and policies of the Central City North Community Plan through the provision of on-site open space, recreational amenities, and

landscaping, as discussed above, which would partially offset the demand that would be generated by Project residents for public parks and recreational facilities in the Central City North Community Plan area. The majority of the objectives and policies of the Central City North Community Plan regarding parks and recreation identified in the Regulatory Framework above are applicable to the City, but not to individual development projects. Objective 4-1 calls for the conservation, maintenance and better utilization of existing facilities and Objective 5-1 calls for the preservation of open space resources and where possible develop new open space. The Project would support these objectives indirectly by providing on-site open space and recreational facilities that would partially reduce demand on the existing parks and recreational facilities in the Central City North Community Plan area. The Project would support Objective 5-1 with the provision of on-site open space and recreational amenities (e.g., swimming pool and spa, fitness and recreation rooms, courtyard with planters for cultivating fruits and vegetables, arts and production space, yoga deck, outside dining area, and terraces). This provision of on-site open space and recreational amenities would offset the demand that would be generated by the Project residents for public parks and recreational amenities in the Central City North Community Plan area. In addition, the Project would be required to pay Quimby/Finn fees to the City to satisfy its obligations under the Quimby Act and/or payment of a Dwelling Unit Construction Tax to reduce impacts on park facilities to less than significant. Therefore, Project development would not diminish the quality or accessibility of, or result in the removal of, existing parks or recreational facilities in the Central City North Community Plan area. As such, the Project would not conflict with the parks and recreation policies of the Central City North Community.

Since the Project would support the objectives and policies of the Central City North Community Plan through the provision of on-site open space, recreational amenities and landscaping, and would include payment of applicable Quimby/Finn fees or the Dwelling Unit Construction Tax, the Project would not (a) cause a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks; (b) increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or (c) include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. No mitigation measures would be required.

(b) *Increased Commercial Flexibility Option*(i) *Construction*

Similar to the Project, the construction workers associated with the Flexibility Option would not relocate their households and they would not result in a notable increase in the residential population of the Project area, or a corresponding permanent demand for parks and recreation facilities in the vicinity of the Project Site. Therefore, similar to the Project, any resulting increase, if any, in the use of such parks and recreational facilities would be temporary and negligible. **Therefore, impacts on parks and recreational facilities resulting from construction of the Flexibility Option would be less than significant; no mitigation measures would be required.**

(ii) *Operation*(a) *Public Recreation Plan*

Based on the Flexibility Option's 385 estimated new residents (refer to **Section IV.I, Population and Housing**, of this Draft EIR) and the PRP's long-range standards, the Project would generate demand for 0.77 acres each of neighborhood and community parkland and 2.31 acres of regional parkland for a total of 3.08 acres, meeting the PRP's long-range standards. In accordance with the Public Recreation Plan's more attainable short- and intermediate-range standards, the Project would generate demand for 0.385 acre each of neighborhood and community parks and facilities in addition to the 2.31 acres of regional parkland for a total of 2.70 acres.

Similar to the Project, the Flexibility Option would include a total of approximately 14,870 square feet (0.34 acres) of useable open space which would fall short of the PRP Recreation Plan's long-, intermediate- and short-range guidelines for neighborhood sites and facilities, community sites and facilities, and regional recreational sites and facilities. However, as previously stated, the PRP parkland guidelines are Citywide goals and do not constitute requirements for individual development projects. Furthermore, the intent of the PRP's parkland standards would be met through compliance with state law as enforced through applicable LAMC requirements related to the provision and/or funding of parks and recreational spaces. As previously discussed, such requirements include payment of applicable Quimby/Finn fees¹¹⁴ and/or the Dwelling Unit Construction Tax¹¹⁵ to the City.

¹¹⁴ LAMC Sections 12.33 and 17.12.

¹¹⁵ LAMC Section 21.10.3(a)(1).

(b) *Los Angeles Municipal Code*

The Flexibility Option includes 159 residential units and will provide common open space in conformance with LAMC Section 12.21G. As shown in **Table IV.J.4-3**, the Flexibility Option is required to provide approximately 17,700 square feet of open space,¹¹⁶ After accounting for the requested open space reduction, the Flexibility Option would be required to provide approximately 14,160 square feet of open space. The amount of common open space provided under the Flexibility Option would be the same as the Project without the Flexibility Option.

**Table IV.J.4-3
Flexibility Option Open Space Summary**

Land Use	Amount
Open Space	
Private Open Space	2,400 sf
Outdoor Common Open Space	9,290 sf
Indoor Common Open Space	3,180 sf
Total Open Space Provided	14,870 sf
135 units x 100 square feet	13,500 sf
24 units x 175 square feet	4,200 sf
Required Open Space Without Density Bonus	17,700 sf
Required Open Space With Density Bonus	14,160 sf
<i>du = dwelling units; sf = square feet</i>	
<i>Source: HansonLA Architecture, November 2018.</i>	

To alleviate the demand on City parks and recreational facilities, the Applicant would be required to dedicate parkland or pay Quimby/Finn fees to the City to satisfy its obligations under LAMC Sections 17.12 and 12.33, as discussed under the Regulatory Framework subsection above. Therefore, the Flexibility Option would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities.

(c) *Central City North Community Plan*

Similar to the Project, the Flexibility Option would support the objectives and policies of the Central City North Community Plan through the provision of on-site open space, recreational amenities, and landscaping, as discussed above, which would partially offset the demand that would be generated by residents for public parks and recreational facilities in the Central City North Community Plan area. Similar to the Project, the Flexibility Option would support Objective 5-1 with the provision of on-site open space and recreational amenities (e.g., swimming pool and spa, fitness and recreation rooms,

¹¹⁶ *Flexibility Option: 135 studio and one-bedroom live/work units at 100 square feet of open space per unit equals 13,500 square feet, plus 24 three-bedroom live/work units at 175 square feet of open space per unit equals 4,200 square feet. (13,500 + 4,200 = 17,700).*

courtyard with planters for cultivating fruits and vegetables, arts and production space, yoga deck, outside dining area, and terraces). This provision of on-site open space and recreational amenities would offset the demand that would be generated by the Flexibility Option residents for public parks and recreational amenities in the Central City North Community Plan area. In addition, the Flexibility Option would be required to pay Quimby/Finn fees to the City to satisfy its obligations under the Quimby Act and/or payment of a Dwelling Unit Construction Tax to reduce impacts on park facilities to less than significant. Therefore, development would not diminish the quality or accessibility of, or result in the removal of, existing parks or recreational facilities in the Central City North Community Plan area.

Since the Flexibility Option would support the objectives and policies of the Central City North Community Plan through the provision of on-site open space, recreational amenities and landscaping, and would include payment of applicable Quimby/Finn fees or the Dwelling Unit Construction Tax, the Flexibility Option would not (a) cause a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks; (b) increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or (c) include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. No mitigation measures would be required.

(2) Mitigation Measures

Project-level impacts for the Project and the Flexibility Option, with regard to service ratios of parks and recreation facilities and construction of new parks and recreational facilities would be less than significant; no mitigation measures would be required.

(3) Level of Significance After Mitigation

Project-level impacts for the Project and the Flexibility Option, with regard to of parks and recreation facilities would be less than significant without mitigation.

4. Cumulative Impacts

Due to the similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option, the impacts of the Project and the Flexibility Option related to contributions to cumulative impacts would be essentially the same. Therefore, the conclusions regarding the impact analysis and impact

significance determination presented below for the Project would be the same under the Flexibility Option.

a) Impact Analysis

Implementation of the Project in combination with the 20 Related Projects identified in **Section III, Environmental Setting**, of this Draft EIR, would further increase demand for park and recreational facilities. Employees generated by the commercial projects would be expected to have limited use of public parks and recreational facilities during regular office hours and would be more likely to utilize parks and recreational facilities near their places of residence. However, the increase in residential population from the Project and Related Projects would increase the demand for parks and recreation facilities and further impact the shortage of park/recreational space in the downtown area. However, pursuant to the LAMC, the Related Projects would also be required to provide open space, active or passive, and the majority of the residential projects would likely provide recreational amenities such as gyms or pools for the residents alleviating some demand on public parks. In addition, future impacts on park facilities would be mitigated through the collection of park fees on new development and the provision of parkland pursuant to the City's regulatory requirements. These requirements include payment of Quimby/Finn fees¹¹⁷ and/or the Dwelling Unit Construction Tax,¹¹⁸ as discussed under the Regulatory Framework subsection above. Adherence to the requirements of the City's regulatory requirements would constitute implementation or funding of the Project's fair share of measures designed to alleviate the cumulative impact, and in accordance with *State CEQA Guidelines* Section 15130(a)(3), the Project's contribution to the cumulative impact would therefore be less than cumulatively considerable. **Therefore, cumulative impacts of the Project and Flexibility Option on recreation and parks would be less than significant.**

b) Mitigation Measures

Cumulative impacts related to parks and recreational facilities for both the Project and Flexibility Option would be less than significant; no mitigation measures would be required.

c) Level of Significance After Mitigation

Cumulative impacts related to parks and recreational facilities for both the Project and Flexibility Option were determined to be less than significant without mitigation.

¹¹⁷ LAMC Sections 12.33 and 17.12.

¹¹⁸ LAMC Section 21.10.3(a)(1).

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IV. Environmental Impact Analysis

J. Public Services

5. Libraries

1. Introduction

This subsection describes the potential impacts of the Project on library services. This subsection utilizes information from the following resources: the Los Angeles Public Library (LAPL) website, the Los Angeles Citywide General Plan Framework Element, and written correspondence with Tom Jung, Management Analyst II of the Los Angeles Public Library, October 11, 2017, attached as **Appendix K** of this Draft EIR.

2. Environmental Setting

a) Regulatory Framework

(1) Los Angeles General Plan Framework Element

The General Plan Framework Element (Framework Element) adopted by the City Council on December 11, 1996, and readopted in August 2001, includes nine chapters that establish guidance for land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the Framework Element establishes goals, objectives, and policies for the provision of infrastructure and public services within the City including libraries. The Framework Element also outlines the necessary actions that the City must implement to ensure public services and infrastructure to remain viable, sustainable, and able to support the needs of a growing population and economy. Chapter 9 further establishes two objectives for the provision of library services within the City. These objectives are as follows:

Objective 9.20: Adopt a citywide library service standard by the year 2000.

Objective 9.21: Ensure library service for current and future residents and businesses.

The objectives listed above provide the basis for five corresponding policies related to library services of the Framework Element. Of the five policies, the policy relevant to this analysis is the following:

Policy 9.21.1: Seek additional resources to maintain and expand library services.

Additionally, Policy 9.21.2 encourages the expansion of non-traditional library services (e.g., book mobiles) where permanent facilities are not adequate, and Policy 9.21.3 encourages the inclusion of library facilities in mixed-use structures, in community and regional centers, at transit stations, and in mixed-use boulevards.

Further, Chapter 10, Implementation Plans, states that the LAPL is charged with the responsibility of updating the Library Master Plan to provide sufficient capacity to correct existing deficiencies as well as meet the needs of future population. Updates of the plan should:

- a. Identify improvements including, but not limited to, new library facilities, alternatives to "stand-alone facilities" (such as mobile collections and "substations" at transit stations or in mixed-use structures) which encourage greater distribution of library facilities; new methods for acquiring books and equipment; ways to connect library telecommunications services with other City agencies as well as local college and university systems; and ways to identify regional libraries that are appropriate for non-English language collections, consistent with neighborhood needs.
- b. Adopt strategies that enhance the viability of joint development and joint-use opportunities with large commercial projects and the Los Angeles Unified School District, thereby increasing the distribution of library services.
- c. Establish a new City library service standard that is based on the needs and reflects the character of the City.
- d. Identify funding sources and mechanisms for facility improvements that may include citywide assessments, State and Federal grants, and the solicitation of private donations for collections, audio-visual equipment and computer materials.

The improvement plans and policies set forth in the Framework Element have been addressed through the LAPL Branch Facilities Plan and the 1989 and 1998 Library Bond Programs, which are described below.

(2) LAPL Branch Facilities Plan

The LAPL Branch Facilities Plan (Plan), adopted in 1988 and revised in 2007, sets standards for site selection of libraries and identified a list of projects in which existing branch libraries are to be renovated or new facilities constructed in order to bring library

resources to the residents of the City in accordance with the standards in the Plan.¹¹⁹ The goals of the Plan were implemented with money received by two bond programs: Phase I of the Plan was implemented with funds from the 1989 Bond Program and Phase II by the 1998 Bond Program. Under the two bond programs, 64 library facilities have been renovated or built.¹²⁰ As of October 2008, all of the projects identified under the Plan have been completed.¹²¹ At present, the Plan is going through a process of revision in which the list of projects for the LAPL through the year 2030 will be updated.

The City's library policy is guided by the Plan, which is composed of two elements: (1) the Criteria for New Libraries; and (2) the Project List. The Board of Library Commissioners adopted a fully revised Plan on February 8, 2007. This Plan includes guidelines for the construction of branch libraries and specifies standards in defining facility size. According to the current Plan, service criteria are based on floor area required to serve varying amounts of residential population. The Criteria for New Libraries component of the 2007 Branch Facilities Plan recommends facility size standards for new libraries based on their respective service populations. In addition, the LAPL suggests the addition of a second branch to be developed for communities with populations above 90,000. There are no planned improvements to add capacity through expansion or development of new libraries in the Project area.¹²²

**Table IV.J.5-1
LAPL Branch Facilities Site Selection Criteria**

Population Served	Size of Facility (square feet)
Below 45,000	12,500
Above 45,000	14,500 ^a
Regional Branch	20,000
<i>a For communities with populations above 90,000, the LAPL suggests adding a second branch to that area.</i> <i>Source: Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 10, 2017, Appendix K of this Draft EIR.</i>	

(3) LAPL Strategic Plan 2015-2020

The LAPL Strategic Plan 2015-2020 (Strategic Plan), adopted in 2015, is the most current Strategic Plan that sets goals for increasing the number of people who use library services, increase the number of library card holders, and actively promote and market programs and services to increase overall engagement with the library.¹²³ Measure L, approved by City voters on March 8, 2011, amends the City Charter to incrementally

¹¹⁹ Los Angeles Public Library, *Los Angeles Public Library Strategic Plan 2015-2020*.

¹²⁰ Los Angeles Public Library, *Los Angeles Public Library Strategic Plan 2015-2020*.

¹²¹ Los Angeles Public Library, *Los Angeles Public Library Strategic Plan 2015-2020*.

¹²² Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.

¹²³ Los Angeles Public Library, *Los Angeles Public Library Strategic Plan 2015-2020*.

increase the amount the City is required to dedicate annually from its General Fund to LAPL to an amount equal to 0.03 percent of the assessed value of all property in the City, and incrementally increase LAPL's responsibility for its direct and indirect costs until it pays for all of its costs. With the passage of Measure L, the LAPL is offering enhanced programs, increased collections, additional technology, an expanded digital presence, and increased opportunities for connection within and between communities. The Strategic Plan is comprised of the following six goals to achieve the increased use of local libraries:

- **Goal 1:** Cultivate and Inspire Young Readers;
- **Goal 2:** Nurture Student Success;
- **Goal 3:** Champion Literacy and Lifelong Learning;
- **Goal 4:** Contribute to L.A.'s Economic Growth;
- **Goal 5:** Stimulate the Imagination; and
- **Goal 6:** Strengthen Community Connections and Celebrate L.A.

(4) Central City North Community Plan

The 2000 Central City North Community Plan guides land uses on the Project Site and in the surrounding areas. The current plan (adopted December 15, 2000) contains the following goal, objective, policies, and programs related to libraries:

Goal 7: Ensure that adequate library facilities are provided for the community's residents.

Objective 7-1: To encourage the City's Library Department to provide adequate library service which responds to the needs of the community.

Policy 7-1.1 Encourage flexibility in siting libraries in mixed-use projects, shopping malls, pedestrian-oriented areas, transit stations, office buildings, and similarly accessible facilities.

Program: Through the inclusion of this policy in the Plan text, the Plan supports these identified locations as desirable sites for new libraries and recommends that this policy be considered when the Library Department and decision-makers review and approve site for new libraries.

b) Existing Conditions

(1) Regional Facilities

The LAPL provides library services throughout the City, which includes the Central Library, eight regional branch libraries, 72 community branches and online resources.¹²⁴

¹²⁴ Los Angeles Public Library, Location & Hours, website: <http://www.lapl.org/branches>, accessed: April 24, 2020.

During the 2017-2018 fiscal year, the LAPL provided library services to approximately 11.2 million visitors across the City's 470-square miles in addition to 15.4 million web visits.¹²⁵ The LAPL has over 7.1 million books, magazines, DVD, CD materials with 100 online databases, 501,847 e-books, e-audiobooks, e-music and e-videos and three million historic and contemporary images.¹²⁶ Administratively, the LAPL is divided into six geographic regions, which includes: Central Southern, Northeast, East Valley, West Valley, and Hollywood.¹²⁷ The Project Site is located in the LAPL's Northeast region.

The LAPL's network of libraries includes expanded and rebuilt facilities, as well as facilities at new locations. All branch libraries provide free access to computer workstations, thereby enabling patrons to access the internet and the LAPL's electronic resources, including an online catalog, subscription databases, word processing, language learning, and a large collection of historic documents and photographs. In addition, specially designed websites are provided for children, teens, and Spanish speakers.

The LAPL is a member of the Southern California Library Cooperative, an association of 39 independent city, county, and special district public libraries located in Los Angeles and Ventura counties that have agreed to cooperate in providing library service to the residents of all participating jurisdictions. The Southern California Library Cooperative provides member libraries with a resource-sharing network and a means to enhance the level and diversity of resources available to library users, while reducing duplication of effort.¹²⁸

(2) Local Facilities

According to information provided by the LAPL,¹²⁹ the Project Site is located within service area of several library facilities within a two-mile radius, the distance that is generally considered to encompass the service area of a library.¹³⁰ Three of the libraries are less than two miles, one is slightly more than two miles away. **Figure IV.J-5.1, Library Location Map**, presents the location of the LAPL four libraries serving the Project Site.

The Richard J. Riordan Central Library (Central Library) serves as the headquarters for the Los Angeles Public Library at 630 West 5th Street, approximately 1.9 mile northwest of the Project Site. The Central Library is approximately 538,000 square feet in size and carries 2.6 million volumes in collection and annual circulation of 1.2 million with a staff of

¹²⁵ Los Angeles Public Library website, *Facts*.

¹²⁶ Los Angeles Public Library website, *Facts*.

¹²⁷ Los Angeles Public Library, *Library Directory and Branch Map*.

¹²⁸ Southern California Library Cooperative, *Member Libraries*.

¹²⁹ Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.

¹³⁰ L.A. CEQA Thresholds Guide, Section K.5, p. K.5-2.

390 full-time employees. Additionally, library staff answer over two million reference questions and present 2,100 programs that attract nearly 46,000 people each year. Furthermore, nearly 600,000 hours of computer access are provided to Central Library users annually. The Central Library is not only a resource for the local population, it serves the entire City and County of Los Angeles as well. The estimated current service population (based on the 2010 Census data) is approximately 3,792,662 persons within the City and 9,818,605 persons within the County of Los Angeles. The Central Library exceeds the recommended building size standard of up to 20,000 square feet for a Regional Branch. However, the 2007 Branch Facilities Plan also recommends the addition of a second branch for communities with populations above 90,000 persons.¹³¹ As described below, there are three other branch libraries approximately two-miles or less from the Project Site.

The closest local library branch is the Little Tokyo Branch located at 203 South Los Angeles Street, approximately 1.5 miles northwest of the Project Site. The Little Tokyo Branch Library is approximately 12,500 square feet and carries 66,634 volumes in collection and annual circulation of 143,317 with a staff of 10.0 full-time employees. Based on the 2010 Census data, the service population of the Little Tokyo Branch Library is approximately 45,796 persons.¹³² As a result, the Little Tokyo Branch Library currently does not meet the 2007 Branch Facilities Plan's recommended building size standards (14,500 square feet for a service population over 45,000 persons as identified in **Table IV.J-5.1**).

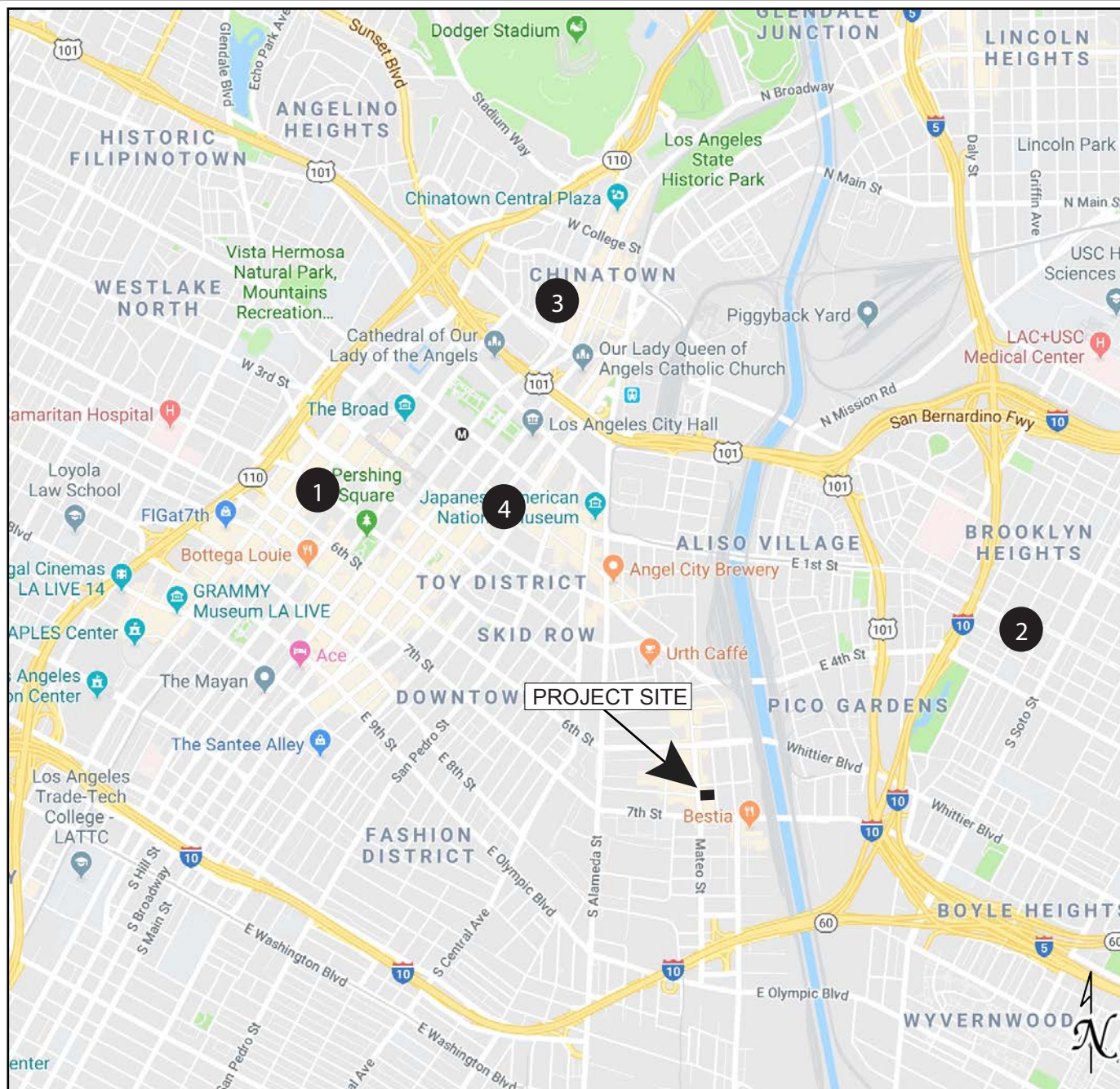
The Ben Franklin Branch Library is located at 2200 E. First Street, approximately 1.7 northeast of the Project Site. The branch is approximately 9,656 square feet in size and carries 35,545 volumes in collection and an annual circulation of 126,012 with a staff of 11 full-time employees. Based on the 2010 Census data, the service population of the Ben Franklin Branch Library is approximately 40,319 persons.¹³³ As a result, the Ben Franklin Branch Library currently does not meet the 2007 Branch Facilities Plan's recommended building size standards (12,500 square feet for a service population less than 45,000 persons).¹³⁴

¹³¹ Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.

¹³² Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.

¹³³ Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.

¹³⁴ Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.



Source: Google Maps, August 2018.

- 1 Central Library:
630 W. 5th Street
- 2 Benjamin Franklin Branch Library:
2200 E. 1st Street
- 3 Chinatown Branch Library:
639 N. Hill Street
- 4 Little Tokyo Branch Library:
203 S. Los Angeles Street

Figure IV.J.5-1
Library Location Map

The Chinatown Branch Library is located at 639 North Hill Street and is approximately 2.2 miles north miles of the Project Site. The Chinatown Branch Library is approximately 14,500 square feet in size and carries 74,709 volumes in collection and circulation of 238,872 with a staff of 13.5 full-time employees. Based on the 2010 Census data, the service population of the Chinatown Branch Library is approximately 11,225 persons.¹³⁵ The Chinatown Branch Library currently meets the 2007 Branch Facilities Plan's recommended building size standards (i.e., 12,500 square feet for a service population below 45,000 persons). However, it should be noted that the circulation of 238,872, is due to nearby school locations which greatly increase its use well beyond the 11,225 population of the community that it serves.¹³⁶

All four of the libraries offer special facilities and services that include free public wireless internet, wireless printing, computer reservations, meeting room rentals, and zoom text computers for the visually impaired. The hours of operation for the Central Library are: 10 am – 8 pm Mondays-Thursdays, 9:30 am – 5:30 pm Fridays and Saturdays and 1 pm – 5 pm on Sundays. The hours of operation for all three local branch libraries are: 10 am – 8 pm on Mondays and Wednesdays; 12 pm - 8 pm on Tuesdays and Thursdays; and 9:30 am – 5:30 pm on Fridays and Saturdays. The branches are closed on Sundays. The LAPL's web-based resources are available 24 hours a day, seven days a week. At this time, there are no planned improvements to add capacity through expansion or develop new libraries in the Project area.¹³⁷

3. Project Impacts

a) Thresholds of Significance

In accordance with the *State CEQA Guidelines* Appendix G (Appendix G), the Project would have a significant impact related to government facilities, including libraries, if it would:

- a) ***Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for libraries.***

¹³⁵ Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.

¹³⁶ Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.

¹³⁷ Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate library impacts:

- *The net population increase resulting from the proposed project;*
- *The demand for library services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to library services (renovation, expansion, addition, or relocation) and the project's proportional contribution to the demand; and*
- *Whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct support to the LAPL).*

b) Methodology

The environmental impacts of a project with respect to libraries are determined based on the population of the serving libraries service area and ability for existing libraries to serve the project vicinity based on the number of patrons and residents that a project would generate upon project buildout. Based on these projections, it is determined whether a project would exceed the capacity of any existing or proposed libraries such that a new or expanded library or libraries would be needed.

c) Project Design Features

No specific Project Design Features are proposed with regard to libraries.

d) Analysis of Project Impacts

As compared to the Project, the Flexibility Option would change the use of the second floor from residential to commercial, and would not otherwise change the Project's land uses or size. The overall commercial square footage provided would be increased by 22,493 square feet to 45,873 square feet and, in turn, there would be a reduction in the number of live/work units from 185 to 159 units and an increase in the number of bicycle spaces from 154 to 161. The overall building parameters would remain unchanged and the design, configuration, and operation of the Flexibility Option would be comparable to the Project. In the analysis of Project impacts presented below, where similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option would be essentially the same, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option. For those thresholds where numerical differences

exist because of the differences in project parameters between the Project and Flexibility Option, the analysis is presented separately.

Threshold a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for libraries?*

Numerical differences exist for these thresholds because of the differences in project parameters between the Project and Flexibility Option, therefore these analyses are presented separately.

(1) Impact Analysis

(a) Project

(i) Construction

Construction of the Project would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in the Los Angeles and Southern California area, and the operation of the market for construction workers, the likelihood that construction workers would relocate their households as a consequence of working on the Project is negligible. The construction industry differs from most other sectors in several ways:

- There is no regular place of work. Construction workers regularly commute to job sites that change many times over the course of a year. Their sometimes-lengthy daily commutes are facilitated by the off-peak starting and ending times of the typical construction workday.
- Many construction workers are highly specialized (e.g., crane operators, steel workers, masons) and move from job site to job site as dictated by the demand for their skills; and
- The work requirements of most construction projects are highly specialized. Workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process.

Therefore, the construction workers associated with the Project would not result in a notable increase in the residential population of the Project area, or a corresponding permanent demand for library services in the vicinity of the Project Site.

In addition, it is unlikely that construction workers would visit the Project area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of libraries by construction workers is anticipated to be negligible.

As such, Project construction would not cause local libraries to exceed its capacities to adequately serve the existing residential population based on target service populations or as defined by the LAPL. Project construction would not substantially increase the demand for library services for which current demand exceeds the ability of the facility to adequately serve the population. **As such, Project construction would not result in the need for new or physically altered libraries, the construction of which would cause significant environmental impacts. Impacts on library facilities during Project construction would be less than significant and no mitigation measures are required.**

(ii) *Operation*

As described above, based on information provided by the LAPL, the Project Site is located within the service areas of the Central Library, Little Tokyo Branch Library, Ben Franklin Branch Library and Chinatown Branch Library.¹³⁸ These four libraries are located within an approximately two-mile radius of the Project Site, the distance that is generally considered to comprise the service area of a library.¹³⁹ Therefore, these libraries could also provide library service to the Project Site.

The Project Site currently does not include any housing, thus, there are no residents on the Project Site that use the four identified libraries. The Project would involve the demolition of the existing warehouse and surface parking lot, and the construction of an approximately 197,355-square-foot mixed-use building including approximately 185 live/work units, approximately 15,320 square feet of open space for residents, approximately 23,380 square feet of commercial uses, and associated parking facilities. As addressed in **Section IV.I, Population and Housing**, of this Draft EIR, based on the Central City North Community Plan area community's household demographics there are approximately 2.42 persons per non single-family household.¹⁴⁰ Based on this average,

¹³⁸ Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.

¹³⁹ L.A. CEQA Thresholds Guide, Section K.5, pg. K.5-2.

¹⁴⁰ Los Angeles Department of City Planning Demographic Research Unit, Census 2010 Population by Housing Type, Central City North Community Plan Area.

approximately 448 new residents would occupy the 185 units (2.42×185) on the Project Site. The Project's population would increase the demand for library services compared to existing conditions.

The Project's commercial uses, as identified in **Section IV.I, Population and Housing**, of the Draft EIR, in **Table IV.I-3, Project Generation of Population, Housing, and Employment**, would generate a total of 92 new employees. However, accounting for the existing 94 employees, the Project would actually result in a net *decrease* of 2 employees at the Project Site. Thus, if employees currently use existing library facilities serving the Project Site, there would be a decrease in demand compared to existing conditions. Thus, any indirect or direct new demand for library services generated by employees of the proposed restaurant/retail use would already be accounted for in existing library services.

As described above, according to the LAPL, the Central Library's current service population is 3,792,662 persons. With the addition of the Project's 448 estimated new residents, the service population of the Central Library would increase to 3,793,110 persons. As discussed above, the Central Library is not only a resource for the local population, but it is also a destination for regional, domestic, and international patrons and serves the entire LAPL service area and provides resources that go beyond those provided through local and regional branch libraries. The LAPL Branch Facilities Plan does not identify population served or facility size criteria for this facility as it serves not just the downtown area but the entire City and County as a unique facility with resources that go beyond what is provided through local and regional branch libraries.

Currently, of the three local branches, only the Chinatown Branch Library meets the recommended building size standards of 12,500 square feet for a service population of less than 45,000 persons. The current population within the service boundary is 11,225 persons, or 33,775 persons below the level at which a new library might be considered. The Project's new 448 residents would constitute approximately 1.3 percent of the 33,775 persons, the allowable population without triggering the LAPL's threshold for a new branch library. As such, the library's existing service level would be maintained without an additional library or alterations to the existing library. Furthermore, the use of the Chinatown Branch Library by Project residents is anticipated to be minimal, due to its distance from the Project Site and the likely scenario of Project residents to use the nearest library, the Little Tokyo Branch Library, as well as the Central Library. Therefore, the library would continue to meet the recommended building size standards.

The Little Tokyo Branch Library, which is closest to the Project Site, and Ben Franklin Branch Library currently do not meet the recommended building size standards of 14,500 square feet for a service population of more than 45,000 persons nor 12,500 square feet for a service population of less than 45,000 persons. With the addition of the Project's 448 estimated new residents, the service population for the 12,500 square foot Little

Tokyo Branch Library would increase from 45,796 persons to 46,244 persons. The current population within the service boundary is 45,796 persons, or 796 persons above the level at which a new library might be considered. LAPL has stated that there are no planned improvements to add capacity to the Little Tokyo Branch Library through expansion, and there are no plans for the development of any other new libraries to serve this community. As such, the Little Tokyo Branch Library would continue its operations without meeting the recommended building size standards with or without the Project.

With the addition of the Project's 448 new residents the 9,656-square-foot Ben Franklin Branch Library service population would increase from 40,319 persons to 40,767 persons. The current population within the service boundary is 40,319 persons, or 319 persons above the level at which a new library might be considered. As such, the Ben Franklin Branch Library would continue its operations without meeting the recommended building size standards without or with the Project.

The *L.A. CEQA Thresholds Guide* considers whether a project includes features that would reduce demand for library services. The Project's residential units would be equipped to receive individual internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations.^{141,142,143} In addition, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, etc.) that could potentially be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the Project area, as deemed appropriate. The Project's revenue to the General Fund would help offset the Project-related increase in demand for library services. As such, the Project would not conflict with or impede implementation of the applicable policies and goals related to libraries in the Framework or Community Plan.

The Project's addition of 448 new residents to the area would not generate a substantial increase in demand for library facilities or services that would require new or physically altered library facilities in order to maintain acceptable service ratios, or increase the demand for library services for which current demand exceeds the ability of the facility to adequately serve the population. Moreover, if all new residents were to use one of the three above-identified libraries, none of the libraries would exceed the recommended 90,000-person preferred limit. The Project Applicant would pay a \$200 per capita fee to LAPL. These funds would be used for staff, books, computers, and other library materials. Essentially, the provision of library services is the responsibility of local government,

¹⁴¹ *National Endowment for the Arts, "To Read or Not to Read," Research Report 47, November 2007. See page 10: "Literacy reading declined significantly in a period of rising internet use."*

¹⁴² *Denise A. Troll, Distinguished Fellow, Digital Library Federation, "How and Why are Libraries Changing?," January 9, 2001.*

¹⁴³ *Calro Tenopir, "Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies," August 2003.*

which is typically financed through the City general funds. Fees would be paid by the Project Applicant, as applicable, as a Condition of Approval. Regardless, the library's existing service level would be maintained without an additional library or alterations to the existing library. Therefore, combined with the LAPL standards for new development and the fees to help to pay for any improvements that the LAPL may do in the future impacts to library facilities would be less than significant. **The Project would not result in the need for new or altered facilities, the construction of which would cause significant environmental impacts. As such, impacts on library facilities during operation of the Project would be less than significant and no mitigation measures are required.**

(b) Increased Commercial Flexibility Option

(i) Construction

Characteristics of construction workers and library usage under the Flexibility Option would be the same as the Project.

Construction would not substantially increase the demand for library services for which current demand exceeds the ability of the facility to adequately serve the population. As such, construction of the Flexibility Option would not result in the need for new or physically altered libraries, the construction of which would cause significant environmental impacts. Impacts on library facilities during construction would be less than significant and no mitigation measures are required.

(ii) Operation

The commercial uses, as identified in **Section IV.I, Population and Housing**, of this Draft EIR, in **Table IV.I-5, Flexibility Option Generation of Population, Housing, and Employment**, would generate a total of 151 new employees. However, accounting for the existing 94 employees, the Flexibility Option would actually result in a net increase of 57 employees at the Project Site. If employees currently use existing library facilities serving the Project Site, there would be an increase in demand compared to existing conditions. However, it is reasonable to expect that some of the new employees would be drawn from the local labor force within the Central City North Community Plan area and surrounding communities and therefore, may already be residents within the LAPL service area and not new to the entire system. Moreover, employees at the Project Site would be more likely to use libraries near their homes than near their place of work. Additionally, employees at the Project Site would have internet access, which provides information and research capacities and reduces the demand at physical library locations.

As described above, according to the LAPL, the Central Library's current service population is 3,792,662 persons. With the addition of the Flexibility Option's 385

estimated new residents, the service population of the Central Library would increase to 3,793,047 persons. As discussed above, the Central Library is not only a resource for the local population, but it is also a destination for regional, domestic, and international patrons and serves the entire LAPL service area and provides resources that go beyond those provided through local and regional branch libraries. The LAPL Branch Facilities Plan does not identify population served or facility size criteria for this facility as it serves not just the downtown area but the entire City and County as a unique facility with resources that go beyond what is provided through local and regional branch libraries.

Currently, of the three local branches, only the Chinatown Branch Library meets the recommended building size standards of 12,500 square feet for a service population of less than 45,000 persons. The current population within the service boundary is 11,225 persons, or 33,775 persons below the level at which a new library might be considered. The Flexibility Option's 385 estimated new residents would constitute approximately 1.1 percent of the 33,775 persons, the allowable population without triggering the LAPL's threshold for a new branch library. As such, the library's existing service level would be maintained without an additional library or alterations to the existing library. Furthermore, the use of the Chinatown Branch Library by Flexibility Option residents is anticipated to be minimal, due to its distance from the Project Site and the likely scenario of Flexibility Option residents to use the nearest library, the Little Tokyo Branch Library, as well as the Central Library. Therefore, the library would continue to meet the recommended building size standards.

Similar to the Project, the Flexibility Option's residential units would be equipped to receive individual internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations.^{144,145,146} and the Flexibility Option's revenue to the General Fund would help offset the Project-related increase in demand for library services. As such, the Flexibility Option would not conflict with or impede implementation of the applicable policies and goals related to libraries in the Framework or Community Plan.

Similar to the Project, the Flexibility Option's addition of 385 new residents to the area would not generate a substantial increase in demand for library facilities or services that would require new or physically altered library facilities in order to maintain acceptable service ratios, or increase the demand for library services for which current demand exceeds the ability of the facility to adequately serve the population. Moreover, if all new

¹⁴⁴ National Endowment for the Arts, "To Read or Not to Read," Research Report 47, November 2007. See page 10: "Literacy reading declined significantly in a period of rising internet use."

¹⁴⁵ Denise A. Troll, Distinguished Fellow, Digital Library Federation, "How and Why are Libraries Changing?", January 9, 2001.

¹⁴⁶ Calro Tenopir, "Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies," August 2003.

residents were to use one of the three above-identified libraries, it would not exceed the recommended 90,000-person preferred limit. The Flexibility Option Applicant would pay a \$200 per capita fee to LAPL. These funds would be used for staff, books, computers, and other library materials. Fees would be paid by the Project Applicant, as applicable, as a Condition of Approval. Essentially, the provision of library services is the responsibility of local government, which is typically financed through the City general funds. Regardless, the library's existing service level would be maintained without an additional library or alterations to the existing library. Therefore, combined with the LAPL standards for new development and the fees to help to pay for any improvements that the LAPL may do in the future impacts to library facilities would be less than significant. **Therefore, the Flexibility Option would not result in the need for new or altered facilities, the construction of which would cause significant environmental impacts. As such, impacts on library facilities during operation of the Flexibility Option would be less than significant and no mitigation measures would be required.**

(2) Mitigation Measures

Project-level impacts for the Project and the Flexibility Option, with regard to library facilities, would be less than significant; no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts for the Project and the Flexibility Option, with regard to library facilities, would be less than significant without mitigation.

4. Cumulative Impacts

Numerical differences exist regarding the impact analysis and impact significance determination presented below because of the differences in project parameters between the Project and Flexibility Option, therefore these analyses are presented separately.

a) Impact Analysis

(1) Project

As identified in **Section III, Environmental Setting**, of this Draft EIR, there are 20 Related Projects located in the Project vicinity. Cumulative growth in the Project vicinity includes approved, under construction, proposed, or reasonably foreseeable projects within the vicinity of the Project that could produce a related or cumulative impact on the local environment when considered in conjunction with the Project. It is conservatively assumed that all 20 Related Projects are built as currently proposed. As such, these Related Projects would have the potential to increase the need for library services. The

residential population of a library's service area is the primary metric used by the LAPL for assessing the adequacy of library services and planning for future growth. The LAPL has not established any facilities criteria based on employment in a library's service area. Employees generated by the non-residential Related Projects would be more likely to use library facilities near their places of residence, as opposed to patronizing the Central Library, Chinatown, Little Tokyo, or Ben Franklin branch libraries, because lunch break times are typically not long enough (30 to 60 minutes) for employees to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that employees would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of libraries by employees is anticipated to be negligible. **Therefore, the Project and non-residential Related Projects would not substantially contribute to a significant cumulative demand for library services.**

As presented in **Table IV.I-7, Total Cumulative Development (Project) (Section IV.I, Population and Housing** of this Draft EIR), the Related Projects and the Project would generate approximately 13,289 residents, a conservative estimate that assumes all residents would be new to the Project area. The geographic scope for the cumulative impact analysis is the extent of the Related Projects that would be served by the four branches serving the Project Site. Based on the location of the Related Projects they may be located within the service boundary of other local libraries. Moreover, one of the libraries serving the Project Site is the Central Library, the headquarters of the LAPL, which has an official service population of the entire City.

Similar to the Project, the related residential projects, which would generate 12,841 residents, would be subject to the standards to determine demand for library facilities used by the City. There are no currently planned improvements to add capacity through expansion to existing libraries and no plans for the development of any other new libraries to serve the Project community.¹⁴⁷ However, similar to the Project, each Related Project, and other future development in the Central City North Community Plan area would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, etc.) that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the Project area, as deemed appropriate. These revenues to the General Fund would help offset the increase in demand for library services as a result of the Project and the Related Projects. However, similar to the Project, each Related Project, and other future development in the Central City North Community Plan area would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, etc.) that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving

¹⁴⁷ Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.

the Project area, as deemed appropriate. These revenues to the General Fund would help offset the increase in demand for library services as a result of the Project and the Related Projects. If LAPL determines that new facilities are necessary at some point in the future, it is reasonably anticipated that such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and one acre in size, and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under *State CEQA Guidelines* Section 15301 or 15332 and would not be expected to result in significant impacts.

Furthermore, with the shift in technology from books to computers, the demand for library facilities is changing. As stated above, members of LAPL have access to thousands of podcasts, audiobooks, media publications, and instructional content online and via smartphone applications made available to library patrons. The availability of such resources reduces the demand for physical library space. Recognizing these facts, the Los Angeles Public Library Strategic Plan 2015-2020 places emphasis on the employment of new technology for meeting future needs and includes objectives for increasing its digital collections, e-mail circulation and use of mobile apps.¹⁴⁸ This has the result of allowing the LAPL to meet increased population demand aside from the provision of new physical facilities. Notwithstanding, the LAPL recommends a per capita fee of \$200 to be used for staff, books, computers, and other library materials. Fees would be paid by the Project Applicant, as applicable, as a Condition of Approval. **Based on the above, cumulative impacts to library services would be less than significant.**

(2) Increased Commercial Flexibility Option

As identified in **Section III, Environmental Setting**, of this Draft EIR, there are 20 Related Projects located in the Project vicinity. Cumulative growth in the Project vicinity includes approved, under construction, proposed, or reasonably foreseeable projects within the vicinity of the Project that could produce a related or cumulative impact on the local environment when considered in conjunction with the Project. It is conservatively assumed that all 20 Related Projects are built as currently proposed. As such, these Related Projects would have the potential to increase the need for library services. As previously discussed, the residential population of a library's service area is the primary metric used by the LAPL for assessing the adequacy of library services and planning for future growth. Employees generated by the non-residential Related Projects would be more likely to use library facilities near their places of residence, as opposed to patronizing the Central Library, Chinatown, Little Tokyo or Ben Franklin branch libraries, because lunch break times are typically not long enough (30 to 60 minutes) for employees to take advantage of library facilities, eat lunch, and return to work within the allotted time.

¹⁴⁸ *Los Angeles Public Library, Building on Success: Strategic Plan, 2007–2010: notably Objectives 2-1, 5-2, 5-4, 6-2 and 6-3.*

It is also unlikely that employees would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of libraries by employees is anticipated to be negligible. **Therefore, the non-residential Related Projects would not substantially contribute to the Flexibility Option's cumulative demand for library services.**

As presented in **Table IV.I-9, Total Cumulative Development (Flexibility Option) (Section IV.I, Population and Housing,** of this Draft EIR), the Related Projects and the Flexibility Option would generate approximately 13,226 residents, a conservative estimate which assumes that all residents would be new to the Project area. Based on the location of the Related Projects they may be located within the service boundary of other local libraries. Moreover, one of the libraries serving the Project Site is the Central Library, the headquarters of the LAPL, which has an official service population of the entire City.

Similar to the Flexibility Option, the related residential projects, which would generate 12,841 residents, would be subject to the standards to determine demand for library facilities used by the City. There are no currently planned improvements to add capacity through expansion to existing libraries and no plans for the development of any other new libraries to serve the Project community.¹⁴⁹ However, similar to the Flexibility Option, each Related Project, and other future development in the Central City North Community Plan area would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, etc.) that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the area, as deemed appropriate. These revenues to the General Fund would help offset the increase in demand for library services as a result of the Flexibility Option and the Related Projects. If LAPL determines that new facilities are necessary at some point in the future, it is reasonably anticipated that such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and one acre in size, and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under *State CEQA Guidelines* Section 15301 or 15332 and would not be expected to result in significant impacts.

Furthermore, with the shift in technology from books to computers, the demand for library facilities is changing. As stated above, members of LAPL have access to thousands of podcasts, audiobooks, media publications, and instructional content online and via smartphone applications made available to library patrons. The availability of such resources reduces the demand for physical library space. Recognizing these facts, the

¹⁴⁹ Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.

Los Angeles Public Library Strategic Plan 2015-2020 places emphasis on the employment of new technology for meeting future needs and includes objectives for increasing its digital collections, e-mail circulation and use of mobile apps.¹⁵⁰ This has the result of allowing the LAPL to meet increased population demand aside from the provision of new physical facilities. Notwithstanding, the LAPL recommends a per capita fee of \$200 to be used for staff, books, computers, and other library materials. Fees would be paid by the Project Applicant, as applicable, as a condition of Project approval. **Based on the above, cumulative impacts to library services would be less than significant.**

b) Mitigation Measures

Cumulative impacts related to libraries for both the Project and Flexibility Option would be less than significant; no mitigation measures are required.

c) Level of Significance After Mitigation

Cumulative impacts related to libraries for both the Project and Flexibility Option were determined to be less than significant without mitigation.

¹⁵⁰ *Los Angeles Public Library, Building on Success: Strategic Plan, 2007–2010: notably Objectives 2-1, 5-2, 5-4, 6-2 and 6-3.*