IV. Environmental Impact Analysis

H. Public Services

1. Fire Protection

1. Introduction

This section analyzes the Proposed Project's potential impacts upon fire protection services. Fire protection services in the Project area are provided by the City of Los Angeles Fire Department (LAFD). This section is based, in part, on the LAFD's existing resources and capabilities to serve the Project area and addresses the adequacy of emergency response, and the ability of the Project to meet the Los Angeles Municipal Code (LAMC) required fire-flow standards and hydrant requirements. Additionally, LAFD's correspondence letter for the Proposed Project (dated May 22, 2019) is provided as Appendix G.1 to this Draft EIR.

2. Environmental Setting

Fire prevention, fire suppression and life safety services are provided throughout the City of Los Angeles by the LAFD, as governed by the City's General Plan Safety Element and the Fire Code section of the LAMC. The Safety Element and the Fire Code serve as guides to City Departments, government offices, developers and the public for the construction, maintenance and operation of fire protection facilities located within the City of Los Angeles. Policies and programs addressed in the documents include: fire station distribution and location, required fire flow (i.e. water supply), fire hydrant standards and locations, access provisions and emergency ambulance service.

a) Regulatory Framework

(1) State

(a) Occupational Safety and Health Administration

The California Division of Occupational Safety and Health (Cal/OSHA) implements the provisions of the federal Occupational Safety and Health Act at the state level. Cal/OSHA is responsible for developing and enforcing workplace safety standards. Additionally,

OSHA requires employers to implement fire protection and prevention programs in the workplace [29 CFR 1910.38].

(b) California Building and California Fire Codes

California Building Code (CBC) is a compilation of building standards, including fire safety standards for residential and commercial buildings. CBC 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, not covered by the national model code. The California Fire Code is part of the CBC. Typical fire safety requirements of the California Fire Code include: the installation of sprinklers in multi-family structures over 75 feet in height; 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 in wildfire hazard areas. The California Fire Code applies to all occupancies in California, except where more stringent standards have been adopted by local agencies. Specific California Fire Code regulations have been incorporated by reference with amendments, in the Los Angeles Building Code, Fire Safety Regulations.

(c) California Fire Service and Rescue Emergency Aid System

The LAFD participates in the California Fire Service and Rescue Emergency Mutual Aid System through which the California Emergency Management Agency, Fire and Rescue Division is responsible for the development, implementation and coordination of the California Fire Service and Rescue Emergency Mutual Aid Plan (Mutual Aid Plan), as managed by the Governor's Office of Emergency Services (OES).[1] The 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 LAFD is located in Region I. Through the Mutual Aid Plan, 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 Plan 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.

[1] *California Emergency Management Agency, Fire and Rescue Division, California Fire and Rescue Emergency Mutual Aid System, Mutual Aid Plan, https://www.caloes.ca.gov/cal-oes-divisions/fire-rescue/fire-operations, accessed December 2020,*

(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 used exclusively for local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 provides 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, 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 a lead agency will comply with that provision and ensure that public safety services are provided.[2]

(e) California Vehicle Code

Section 21806 of the California Vehicle Code pertains to emergency vehicles responding to Code 3 incidents/calls.[3] This section of the California Vehicle Code states the following: Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as otherwise directed by a traffic officer, do the following: (a)(1) Except as required under paragraph (2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and thereupon shall stop and remain stopped until the authorized emergency vehicle has passed. (2) A person driving a vehicle in an exclusive or preferential use lane shall exit that lane immediately upon determining that the exit can be accomplished with reasonable safety…. (c) All pedestrians upon the highway shall proceed to the nearest curb or place of safety and remain there until the authorized emergency vehicle has passed.

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

[3] *A Code 3 call is an urgent call with top priority for first responders to respond with lights and sirens.*

(2) Local

(a) City of Los Angeles General Plan Framework

The City of Los Angeles General Plan Framework, originally adopted in December 1996 and re-adopted in August 2001, sets forth general guidance regarding land use issues for the entire City and defines citywide policies regarding land use, including public services. Specific fire protection and emergency medical service goals and objectives within the General Plan, Chapter 9, Infrastructure and Public Services, that are applicable to the Project include:

> Goal 9J: Every neighborhood has the necessary level of fire protection service, emergency medical service and infrastructure.
>
> Objective 9.16: Monitor and forecast demand for existing and projected fire facilities and service.
>
> 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 be phased with growth.
>
> Objective 9.19: Maintain the LAFD's ability to assure public safety in emergency situations.

(b) City of Los Angeles General Plan Safety Element

The Los Angeles General Plan Safety Element (Safety Element) was adopted by the Los Angeles City Council on November 26, 1996. The Safety Element generally does not contain specific standards, because City code and regulations contain standards for water, street, development, etc. Most of the Safety Element's goals, objectives, and policies are directed towards the City. City goals for fire safety include:

> Goal 1 A city where potential injury, loss of life, property damage and disruption of the social and economic life of the City due to fire, water related hazard, seismic event, geologic conditions or release of hazardous materials disasters is minimized.
>
> Goal 2 A city that responds with the maximum feasible speed and efficiency to disaster events so as to minimize injury, loss of life, property damage and disruption of the social and economic life of the City and its immediate environs.

Policy 2.1.6 of the Safety Element addresses standards for fire facilities. Policy 2.1.6 states:

> **Policy 2.1.6** Standard/fire. Continue to maintain, enforce and upgrade requirements, procedures and standards to facilitate more effective fire suppression. [All peak load water and other standards, code requirements (including minimum road widths, access, clearances around structures) and other requirements or procedures related to fire suppression implement this policy.].
>
> The LAFD and/or appropriate City agencies shall revise regulations or procedures to include the establishment of minimum standards for 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 event response.

Specific standards for fire prevention and response are listed in the Safety Element and are further incorporated and addressed in the Los Angeles Fire Code (Fire Code).

(c) Los Angeles Municipal Code

The LAMC includes provisions for new construction projects within the City. The LAMC contains, by reference, the California Building Code building construction standards, including the California Fire Code, and reflects the policies of the City's General Plan Safety Element. Chapter V, Article 7, Fire Prevention and Protection (also known as the Fire Code) of the LAMC sets forth regulatory requirements pertaining to the prevention of fires; the investigation of fires and life safety hazards; the elimination of fire and life safety hazards in any building or structure (including buildings under construction); the maintenance of fire protection equipment and systems; and the storage, use, and handling of hazardous materials. 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 pursuant to a permit issued by 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. Under Section 57.4705.1.6, there must be at least one elevator which shall be available for fire EMS and designed so that key switches located in the building control station/fire command center will recall elevator(s) to the designated main floors.

The LAMC also addresses access, fire 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 flow standards. Fire 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 flow requirements vary from 2,000 gallons per minute in low density residential areas to 12,000 gallons per minute in high-density commercial or industrial areas with a minimum residual water pressure of 20 pounds per square inch remaining in the water system. As determined by the LAFD in their written correspondence included in Appendix G.1 of this Draft EIR, the required fire flow for this project has been set at 6,000 to 9,000 gallons per minute from four to six fire hydrants flowing simultaneously.

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 hydrants, and 2.5-inch by 4-inch double fire hydrants 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.

The Fire Code, as it pertains to the Project, specifies standards for development to ensure that adequate fire service features, such as response distance, emergency access, and fire flow, are maintained. The Fire Code specifies the maximum response distance allowed between specific sites and engine and truck companies, based upon land use and fire flow requirements. Table IV.H-1 provides the maximum response distance for fire stations based on the Low Density Residential, High-Density Residential and Commercial Neighborhood, Industrial and Commercial, and High-Density Industrial and Commercial or Industrial land uses. When response distances exceed these requirements, 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, etc.) (LAMC Section 57.507.3.3). Automatic fire

Table IV.H-1
Maximum Response Distance

Land Use	Maximum Response Distance (miles)	
	Engine Company	Truck Company
Low Density Residential	1.5	2
High Density Residential and Commercial Neighborhood	1.5	2
Industrial and Commercial	1	1.5
High Density Industrial and Commercial or Industrial (Principal Business Districts or Centers)	0.75	1

Source: City of Los Angeles, 2017 City of Los Angeles Fire Code, Chapter 5, Table 507.3.3.

sprinkler systems are also required for all multi-family projects in accordance with California Building Code Sections 903.2.8 and 903.3. and structures having occupied floors located more than 75 feet above the lowest level of fire department vehicle access.[4]

(d) Wilshire Community Plan

As discussed in Section IV.E, Land Use, of this Draft EIR, the Project Site is located within the Wilshire Community Plan ("Community Plan") area of the City of Los Angeles. The Wilshire Community Plan, adopted on September 19, 2001, includes the following objective and policies that are relevant to fire protection:

Objective 9-1: Maintain fire facilities and protective services that are sufficient for the existing and future population and land use.

Policy 9-1.1: Coordinate with the City of Los Angeles Fire Department during the review of significant development projects and General Plan amendments affecting land use to determine the impacts on service demands.

Policy 9-1.2: Assist the City of Los Angeles Fire Department in locating fire service facilities at appropriate locations throughout the Wilshire Community Plan Area.

(e) City of Los Angeles Propositions F, J, and Q

Proposition F, the City of Los Angeles Fire Facilities Bond, was approved by voters in November 2000. This bond allocated $532.6 million of general obligation bonds to finance the construction and rehabilitation of fire stations and animal shelters. Under Proposition

[4] *See City of Los Angeles Fire Code (2017), Section 914.3 and 914.3.1.*

F, new regional fire stations to provide training and other facilities at or near standard fire stations must be designed and built on a single site of at least 2 acres. This is to ensure that firefighters in training remain in the service area and are available to respond to emergency calls. Proposition F allocated $378.6 million to build 18 new or replacement neighborhood fire/paramedic stations, one regional fire station and training facility, and one emergency air operations and helicopter maintenance facility, for a total of 20 Proposition F projects. As of January 2017, all of the proposed projects have been completed.[5]

Proposition Q, the Citywide Public Safety Bond Measure was approved by voters in March 2002. Proposition Q allocated $600 million to renovate, improve, expand and construct police, fire, 911, and paramedic facilities. In March 2011, the program was expanded to include renovations to existing LAFD facilities throughout the City. A total of 80 renovation projects at LAFD facilities were scheduled. These renovation projects include the installation of diesel exhaust capture systems, upgrades to air filtration and electrical systems, re-roofing, remodeling, parking lot repair, painting, and other improvements. The fire renovation projects identified under this measure have been completed.[6]

Measure J, which was approved by voters at the November 7, 2006 General Election, is a charter amendment and ordinance that involves technical changes to Proposition F. Measure J allows new regional fire stations funded by Proposition F to be located in densely developed areas to be designed and built on one or more properties equaling less than 2 acres. Components of a regional fire station can be built on two or more sites within close proximity, or the facility can be designed to fit on a single site of less than 2 acres. Components of a regional fire station can be built on two or more sites within close proximity, or the facility can be designed to fit on a single site of less than two acres.

(f) Los Angeles Fire Department Strategic Plan 2018-2020[7]

The Los Angeles Fire Department Strategic Plan 2018-2020, A Safer City 2.0, is a collaborative effort between LAFD staff, city leaders, and community members to accomplish the LAFD's organizational vision. The Strategic Plan 2018-2020 builds upon the progress of the first Strategic Plan from 2015-2017, which resulted in the achievement of 70 percent of its goals. As provided in the Strategic Plan 2018-2020, five goals will

[5] *Los Angeles Fire Department, Los Angeles 2000 Prop F Fire Facilities Bond, Progress Report Feb-March 2016.*

[6] *City of Los Angeles, A 2002 Proposition Q Citywide Safety Bond Program Progress Report – February/March 2016.*

[7] *LAFD, Strategic Plan 2018–2020, A Safer City 2.0, https://issuu.com/lafd/docs/strategic_plan_final_2018.02.09?e=17034503/59029441, accessed January 2020.*

guide the LAFD for the next three years: 1) Provide exceptional public safety and emergency service; 2) Embrace a healthy, safe and productive work environment; 3) Implement and capitalize on advanced technology; 4) Enhance LAFD sustainability and community resiliency; and 5) Increase opportunities for personal growth and professional development.

b) Existing Conditions

Fire protection adequacy for a given area is based on required response distance, fire flow 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, 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) 242 Cal, App. 4th 833, 847 ruling, the City is meeting its constitutional obligation to provide adequate public safety services, including fire protection and emergency medical services.

Citywide, the LAFD has 3,246 uniformed personnel and 353 non-uniformed support staff. Their services include fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education and community service. LAFD has a total of 1,018 firefighters (including 270 serving as firefighter/paramedic-trained personnel) on duty at all times in 106 neighborhood fire stations located across the LAFD's 471 square-mile jurisdiction.[8]

(1) Emergency Access

As described in Section II, Project Description, of this Draft EIR, the Project Site is located within a commercial center known as the Town and Country Shopping Center (Center), consisting of approximately 214,736 square feet of commercial retail land uses, and a surface parking lot. The Project Site occupies the eastern 3.15 acres of the Center property. The existing structures within the Project Site boundaries include a total floor area of approximately 151,048 square feet consisting of 19,175 square feet of retail land uses (including 13,090 square feet of general retail space and 6,085 square feet of restaurant space) and an approximately 131,873 square foot K-Mart retail store. Current vehicular access to the Project Site is provided via two driveways on the east side of S. Fairfax Avenue (one providing access to the Center parking lot and one to the loading driveway), two driveways on the south side of W. 3rd Street (providing access to the main parking lot), and two driveways on the west side of S. Ogden Drive (one providing access to the Center parking lot and one accessing the loading driveway). Section IV.I.

[8] *Los Angeles Fire Department, website: http://www.lafd.org/about/about-lafd/our-mission, accessed April 2019.*

Transportation, of this Draft EIR, provides additional information related to existing vehicular site access, bicycle access, regional highway system, and local street system.

(2) Fire Flow

The required fire flow is closely related to the type and size of the land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard.

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. A minimum residual water pressure of 20 pounds per square inch (psi) is to remain in the water system, with the required gallons per minute flowing. Based on correspondence with the LAFD, the required fire flow for the Proposed Project is set at 6,000 to 9,000 gpm four to six fire hydrants flowing simultaneously.

Water to maintain adequate fire flows for the area surrounding the Project Site is provided by the City of Los Angeles Department of Water and Power (LADWP). All water mains and lines are designed and sized according to LADWP standards and take into account fire flow and pressure requirements. There are three fire hydrants located on the Project Site's western property line and one fire hydrant located on the Project Site's northern property line.[9] Section IV.K.1, Water Supply, provides a complete discussion of water service infrastructure in the Project area.

(3) Fire Protection Facilities and Services

Fire protection and paramedic services are provided to the Project Site and its vicinity by the LAFD. The Project Site is located within Battalion 18 within the South Bureau. There are a total of five fire stations within a 3.5 mile radius of the Project Site, including Fire Station No. 61 (0.9 mile), Fire Station No. 41 (2.3 miles), Fire Station No. 58 (2.7 miles), Fire Station No. 68 (2.9 miles), and Fire Station No. 29 (3.2 miles). Fire Station 61, located at 5821 W. 3rd Street, approximately 0.9 mile from the Project Site, provides primary fire protection and paramedic services to the Project Site. LAFD Station No. 61 is equipped with a task force truck, paramedic ambulance, and rescue ambulance. Table IV.H-2, below, lists the location, equipment and personnel of each aforementioned station. Based on the response distance criteria specified in LAMC 57.507.3.3 and the relative response distances to the two closest LAFD Stations from the Project Site, fire protection response is currently considered adequate. Figure IV.H-1, Fire Station Location Map, shows the location of each fire station in relation to the Project Site.

[9] *City of Los Angeles, Navigate LA, http://navigatela.lacity.org/navigatela/, accessed April 2019.*

Table IV.H-2
Fire Protection Services Serving the Project Site

Fire Station	Equipment and Personnel	Staff	Distance (miles)
Fire Station No. 61 5821 W. 3rd Street Los Angeles, CA 90036	Task Force (Truck and Engine Company), Paramedic Rescue Ambulance, BLS Rescue Ambulance	14	0.9
Fire Station No. 41 1439 N. Gardner Street Los Angeles, CA 90046	Engine, Paramedic Rescue Ambulance and Brush Patrol	6	2.3
Fire Station No. 58 1556 S. Robertson Blvd. Los Angeles, CA 90035	Assessment Engine, 2 Paramedic Rescue Ambulances, and BLS Ambulance	8	2.7
Fire Station No. 68 5023 W. Washington Blvd. Los Angeles, CA 90019	Engine and Paramedic Rescue Ambulance	6	2.9
Fire Station No. 29 4029 W. Wilshire Blvd. Los Angeles, CA 90010	Task Force (Truck and Engine Company), Paramedic Rescue Ambulance, BLS Rescue Ambulance and DECON Tender	14	3.2

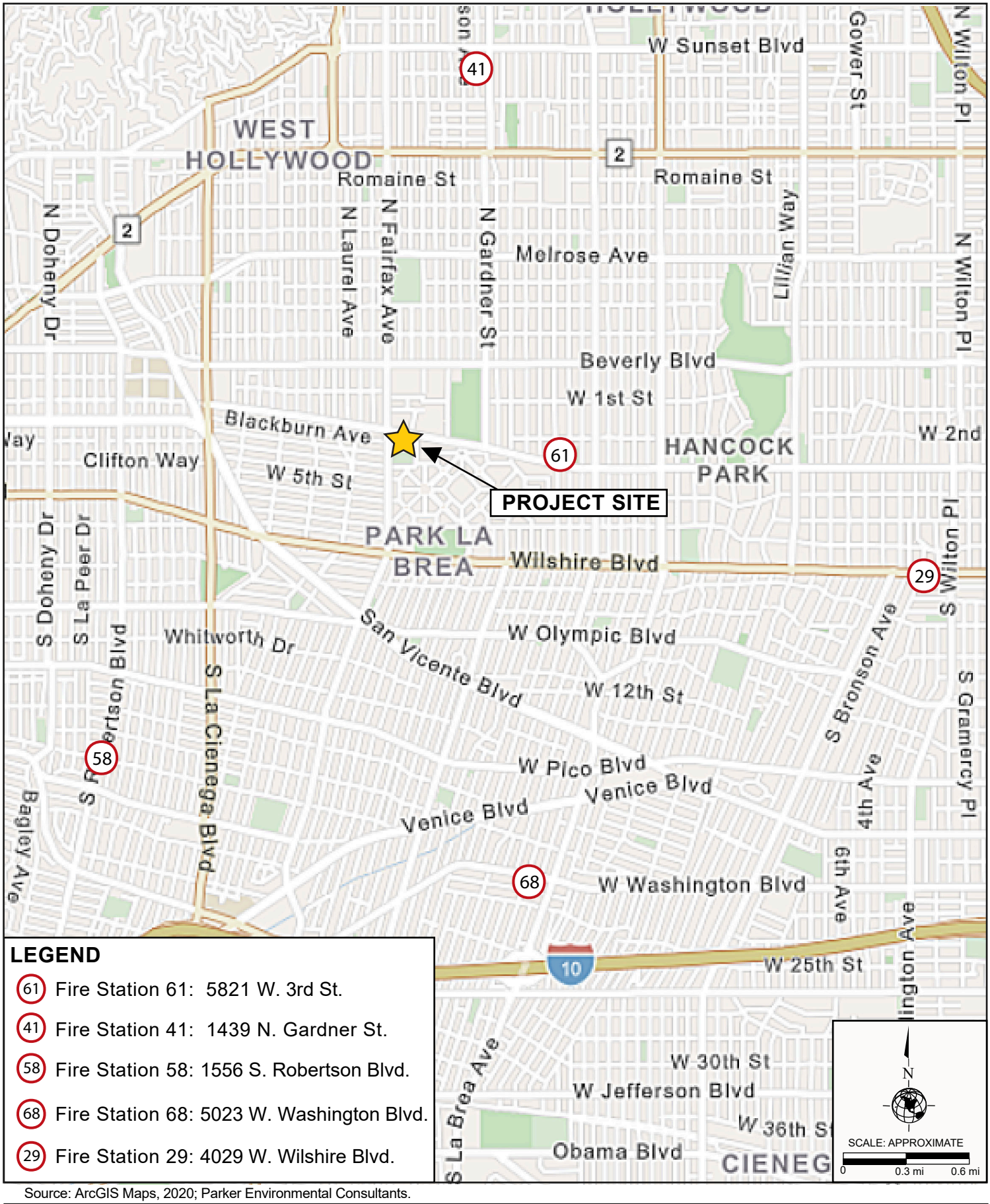
Notes: BLS = basic life support
Source: Los Angeles Fire Department Correspondence Letter, May 22, 2019.

Specific response times for the stations included in Table IV.H-2 during January through December 2019 are shown in Table IV.H-3, below.

Table IV.H-3
Average Emergency Medical Service and Structure Fire Response Times

Fire Station	Average Response Time to EMS Incident (Minutes:Seconds)	Average Response Time to Non-EMS Incident (Minutes:Seconds)
Fire Station No. 61	6:58	6:32
Fire Station No. 41	6:57	7:24
Fire Station No. 58	7:03	7:02
Fire Station No. 68	6:28	6:37
Fire Station No. 29	6:07	5:35
Citywide	6:39	6:23

Notes: EMS = Emergency Medical Service
[a] *Response times are based on January – December 2019 data.*
Source: Los Angeles Fire Department FireStatLA, Stations Map, website: https://www.lafd.org/fsla/stations-map, accessed February 2020.



LEGEND

- 61 Fire Station 61: 5821 W. 3rd St.
- 41 Fire Station 41: 1439 N. Gardner St.
- 58 Fire Station 58: 1556 S. Robertson Blvd.
- 68 Fire Station 68: 5023 W. Washington Blvd.
- 29 Fire Station 29: 4029 W. Wilshire Blvd.

Source: ArcGIS Maps, 2020; Parker Environmental Consultants.

Figure IV.H-1
Fire Station Location Map

The above table regarding response times is provided for informational purposes since 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. Roadway congestion, intersection level of service (LOS), weather conditions, and construction traffic along a response route can affect response times. 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. The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS.

(4) Fire Hazard Areas

There are no wildlands located adjacent to or in the vicinity of the Project Site. In addition, the Project Site is not located within a City-designated Very High Fire Hazard Severity Zone.[10] Therefore, the Project Site is not located within a fire hazard area.

3. Project Impacts

a) Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, a significant impact to fire protection would occur if a project would:

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

The L.A. CEQA Thresholds Guide states that the determination of significance shall be made on a case-by-case basis, considering the following criterion to evaluate fire protection:

[10] *City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/, accessed November 2018.*

- A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service.

In assessing impacts related to fire protection in this section, the City will use Appendix G as the thresholds of significance. The criteria identified above from the L.A. CEQA Thresholds Guide will be used where applicable and relevant to assist in analyzing the Appendix G threshold questions.

b) Methodology

Fire protection and emergency medical service needs relate to the size of the population and geographic area served, the number and types of calls for service, and the characteristics of the Proposed Project and surrounding community. Changes in one or more of these factors may increase the demand for services or the ability for the LAFD to provide an adequate level of service. The LAFD evaluates the demand for fire prevention and protection services on a project-by-project basis, including review of the Project's emergency features, to determine if the Project would require additional equipment, personnel, new facilities, or alterations to existing facilities.

The need for, or deficiency in, adequate fire protection and emergency medical services in and of itself is not a CEQA impact, but a social or economic impact.[11] An EIR must assess whether a project causes a need for additional fire protection and emergency medical services to maintain acceptable service ratios, response times, or other performance objectives. However, 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 whether the project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

There are no current capital improvement plans for the construction or expansion of fire facilities in the impact area. For the Proposed Project, LAFD also determined that fire protection for the Project Site would be adequate.[12] 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

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

[12] *City of Los Angeles Fire Department, Correspondence to the Department of City Planning Re: 3rd and Fairfax Mixed-Use Project, May 22, 2019. (See Appendix G.1 Public Service Letters)*

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, Negative Declaration, or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332. Further, if the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment, 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) 242 Cal.App. 4th 833, 847 ruling, the City is meeting its constitutional obligation to provide adequate public safety services, including fire protection and emergency medical services.

c) Project Design Features

The Proposed Project would comply with all applicable LAMC fire safety requirements, including City fire flow requirements contained in LAMC Section 57.507.3.1, the Building Code (Chapter 9), and the Fire Code (Chapter 7). No specific project design features are proposed with regard to fire protection services.

d) Analysis of Project Impacts

Threshold a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or 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?

(1) Impact Analysis

(a) Construction

The Proposed Project has the potential to increase demands on the LAFD during the construction period. Demolition of the existing structures and construction of the Proposed Project would increase the potential for personal injury and fires from the operation of mechanical equipment, the use and storage of flammable fuel and construction materials, and other dangers that are inherent to the construction industry. The Project would have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. However, construction managers and personnel would be trained in emergency response and fire

safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by OSHA. Implementation of construction industry standards, “good housekeeping” procedures and compliance with mandatory OSHA regulations by the construction contractors would minimize these hazards. Fire suppression equipment specific to construction would be maintained on-site. Procedures that would be implemented during demolition and construction of the Proposed Project include: the maintenance of mechanical equipment in good operating condition; regulatory compliance and careful storage of flammable materials in appropriate containers; and the immediate and complete cleanup of spills of flammable materials when they occur.

Construction activities also have the potential to affect fire protection services by adding temporary construction traffic to the street network and by partial lane closures during street improvements and utility installations. As discussed in Section IV.I, Transportation, the Applicant would be required to develop a Construction Traffic Control/Management Plan prior to construction to minimize the effects of construction on vehicular and pedestrian circulation. The Construction Traffic Control/Management Plan would be required to be submitted to LADOT for review and approval prior to the commencement of the construction period. PDF-TRAFFIC 1 in Section I, Transportation, requires development of a Construction Traffic Control/Management Plan to be approved by LADOT that will identify the location of any roadway closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties.

Furthermore, throughout the construction process, the Proposed Project would be required to maintain appropriate fire flow and access pursuant to the Fire Code, LAMC Sections 57.503 and 57.507.3. ***Project construction would not impact firefighting and emergency services to the extent that there would be a need for new or expanded fire facilities, in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD, the construction of which could cause significant environmental impacts. Therefore, construction-related impacts to fire protection services would be less than significant.***

(b) Operational Impacts

The analysis of the Project's potential operational impacts on fire protection and emergency medical services addresses potential impacts associated with LAFD facilities and equipment, response distances and response times, emergency access, and the ability of the water infrastructure system to provide the necessary fire flows.

(i) Facilities and Equipment

The Project Site would continue to be served by Fire Station No. 61, the "first-in" station for the Project Site, located approximately 0.9 mile east of the Project Site. As shown in Table IV.H-2, Fire Station No. 61 is equipped with a task force truck and engine company, paramedic rescue ambulance, and BLS rescue ambulance. As such, Fire Station No. 61 falls within the 1.0-mile engine company and truck company response distances from the Project Site, required by Section 57.507.3.3 of the LAMC, and would be available to serve the Project in the event of an emergency. Although located beyond the specified response distance requirements, Fire Stations Nos. 41, 58, 68, and 29 have been identified by the LAFD as capable of initial responses needed at the Project Site.

As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently occupied by 151,048 square feet of retail and restaurant space. Based on employee generation rates generated by the LADOT VMT Calculator, these existing commercial uses have approximately 314 employees. There are no residential units currently on the Project Site. The Project would include 331 residential units and approximately 83,994 square feet of commercial space, including approximately 13,412 square feet of commercial/retail space, 63,082 square feet of supermarket space, and 7,500 square feet of restaurant space. As discussed in Section IV.G, Population and Housing, the Proposed Project would have approximately 319 employees, resulting in a net increase of approximately five employees. The Proposed Project would generate approximately 801 new residents. Thus, the Proposed Project would result in an increase in floor area and increase the number of persons on the Project Site, which would potentially increase the demand for LAFD services.

(c) Response Distance and Response Times

According to correspondence with LAFD, the first-due Engine Company should be within one mile, and the first-due Truck Company should be within 1.5 miles. As discussed above, the existing distances from the fire stations serving the Project Site are as follows: Fire Station 61 is located 0.9 mile from the Project Site and is equipped with a task force (i.e., truck and engine company), paramedic rescue ambulance, and BLS rescue ambulance. Based on the response distance criteria specified in LAMC 57.507.3.3 and the relatively short distance from the Project Site to the well-equipped fire stations, fire protection response would be adequate with respect to response distances. Additionally, there are no immediate plans from the LAFD to increase staffing or resources in these stations which would serve the Project, thereby necessitating the construction of new fire protection facilities.[13] Although the Project Site's distance is adequate, fire sprinkler

[13] *City of Los Angeles, LAFD Correspondence Letter, May 22, 2019.*

systems and any other fire protection devices if deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems etc.) per the City of Los Angeles Fire Code would be installed.

Roadway congestion, intersection level of service, weather conditions, and construction traffic along a response route can affect emergency response. The Project-related increase in traffic on surrounding roadways could affect emergency response times in the area. 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.[14] However, a number of factors would serve to facilitate responses to emergency calls. Emergency response is routinely facilitated, particularly for high priority calls, through the use of sirens to clear a path of travel, driving in the lanes of opposing traffic pursuant to CVC Section 21806, the use of alternate routes, and multiple station response. Additionally, the LAFD, in collaboration with 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.[15] The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS. Furthermore, the Project vicinity is also well served by the LAFD, including Fire Stations 61, 41, 58, 68, and 29. Also, because of the general grid pattern of the local street system, each of these fire stations have multiple routes available to respond to emergency calls at the Project Site.

The LAFD would be involved as part of the plan check process and would provide all necessary conditions of approval for the Proposed Project. Compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, would ensure that adequate fire prevention features would be provided in the Project and would reduce the demand on LAFD facilities and equipment.

(i) Emergency Access

Local access to the Project Site is provided via W. 3rd Street, S. Fairfax Avenue and S. Ogden Drive. Vehicle access to the Project Site would be provided from one driveway on W. 3rd Street, one driveway on S. Fairfax Avenue, and two driveways on S. Ogden Drive accessing the parking structure. In addition, the private service driveway would continue to be provided on the southern portion of the Project Site, south of the on-site buildings (See Figure II-7, Proposed Plot Plan in Section II. Project Description). While this is proposed as a one-way eastbound service driveway under the Proposed Project, it would facilitate emergency access from the east or west side of the Project Site. All Project

[14] *LAFD, Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, Bulleting No. 133, October 2008.*

[15] *LADOT, Los Angeles Signal Synchronization Fact Sheet, accessed November 2018.*

driveways would be designed according to LADOT standards to ensure adequate access, including emergency access, to the Project Site. Furthermore, the drivers of 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. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the Proposed Project. The Proposed Project would not involve activities during its operational phase that could impede public access or travel upon public right-of-way or would interfere with an adopted emergency response or evacuation plan.

As discussed in Section IV.I, Transportation, the Proposed Project would result in a less-than-significant impact with respect to traffic, emergency access, and design hazards that currently serve the Project area. Additionally, the site plan would be reviewed and approved by the LAFD and the Department of Building and Safety as part of the plan check approval process, and the Proposed Project would be subject to the approval of the LAFD for compliance with emergency access requirements prior to the issuance of building permits. The Project would provide the LAFD with access roadways, fire lanes, building access, and emergency directional signage as required by the City's Building Code and LAMC.

(ii) Fire Flow

As determined by the LAFD Correspondence Letter (Appendix G.1 of this Draft EIR), the overall fire flow requirement for the Proposed Project is 6,000 to 9,000 gpm from four to six fire hydrants, simultaneously and a 20 psi minimum residual pressure. If required by the LAFD, the Proposed Project would install additional fire hydrant(s) to meet the hydrant spacing requirements as set forth in LAMC Section 57.507.3.2. The number and location of hydrants would be determined as part of LAFD's fire/life safety plan review for the Proposed Project. The required fire flow for the Proposed Project would be confirmed in consultation with the LAFD during the plan check approval process and is subject to change from the required fire flow in the LAMC. As noted above, the minimum fire flow requirement for commercial land uses is 6,000 to 9,000 gpm. Thus, it is expected that the existing fire flow would be sufficient to accommodate the Proposed Project. However, as discussed in the LAFD Correspondence Letter, improvements to the water system in this area may be required to provide the required 6,000 to 9,000 gpm fire flow. The cost of improving the water system may be charged to the Applicant. For more detailed information regarding water main improvements, the Applicant would contact the Water Services Section of the LADWP. As noted on the facility service maps provided by the LADWP, there are four fire hydrants located adjacent to the Project Site.[16] There are two ½" by 4" double hydrants located on the west side of the Project Site adjacent to Fairfax

[16] *See LADWP correspondence to the Department of City Planning in Appendix J.1 to this Draft EIR.*

Avenue, one ½" by 4" double hydrant located at the north west corner of the Project Site at W. Third Street and Fairfax Avenue, and one ½" by 4" double hydrant on the north side of the Development Site midblock between S. Fairfax Avenue and Ogden Drive.

The Water Operations Division of the LADWP would perform a fire flow study at the time of building permit review to ascertain whether further water system or site-specific improvements would be necessary. Hydrants, water lines, and water tanks may be installed per Fire Code requirements and would be based upon the specific land uses of the Proposed Project. The points of connection would be verified at the time of connection to ensure adequate water supply and pressure existing in the proposed connection lines. The Project Applicant would be required to ensure adequate fire flows and infrastructure pursuant to the City's Fire Code.

Therefore, in conclusion, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or 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. Impacts are considered less than significant.

(2) Mitigation Measures

Project impacts with regard to fire protection services would be less than significant. Thus, no mitigation measures would be necessary.

(3) Level of Significance After Mitigation

Impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

Cumulative impacts are based on the 63 related projects provided in Table III-1 of Section III, Environmental Setting, of this Draft EIR. The 63 identified related projects are located within a 1.5-mile radius from the Project Site and identified as proposed, recently approved, under construction, or reasonably foreseeable projects in proximity to the Project Site that could be considered related projects with the potential to produce a cumulative impact on the environment when considered in conjunction with the Proposed Project.

(1) Impact Analysis

(a) Construction

Like the Proposed Project, each related project would have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. However, similar to the Proposed Project, construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulations for Construction established by OSHA. Additionally, in accordance with the provisions established by OSHA for emergency response and fire safety operations, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site. Construction of the related projects would also occur in compliance with all applicable federal, state or local standards.

The closest related projects to the Project Site are Related Projects No. LA41 and LA32, both of which are located within 1,000 feet from the Project Site. This distance was selected to evaluate potential impacts at related projects that may arise from access issues associated with deliveries, construction vehicles, temporary lane closures, and immediate project site accessibility. Related Project No. LA41 is the 3rd Street Mixed-Use Project located at 8000 W. 3rd Street. The timing and specific development plans for this related project are unknown, as it is in design phase. It is unknown if the construction schedule would be concurrent with the Proposed Project. Related Project No. LA32 is the Fairfax Apartments, located at 105 S. Fairfax Avenue. This related project has completed construction but is not yet occupied. Thus, within 1,000 feet of the Development Site, only Related Project No. LA41 and the Proposed Project may have concurrent construction activities. As such, specific coordination among Related Project No. 41 and the Proposed Project would be required and implemented through the Construction Traffic Control/Management Plan, which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-way. The Plan will also address the potential conflicts associated with concurrent construction activities of related projects, if applicable (See PDF-TRAFFIC-1). The Traffic Control/Management Plan would minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation. While it is expected that the majority of construction activities for the Proposed Project would primarily be confined onsite, limited offsite construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially require temporary lane closures. However, if lane closures are necessary, the remaining travel lanes would be maintained in accordance

with the LADOT-approved Traffic Control/Management Plan. Similar to the Proposed Project, each related project would implement similar design features during construction and would be subject to the City's routine construction permitting process, which includes a review by the LAFD to ensure that sufficient security measures are implemented to reduce potential impacts to fire protection services. Furthermore, construction-related traffic generated by the Project and the related projects would not significantly impact LAFD response times within the Project Site vicinity as drivers of fire and 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, allowed under CVC Section 21806. Finally, the Proposed Project in and of itself would not cause a significant impact to fire protection services during construction. ***Based on the above, the combined effects of both the Project and related projects would not be cumulatively significant, and the Proposed Project's incremental impact would not be cumulatively considerable.***

(b) Operation

Operation of the Proposed Project, in combination with operation of the 63 related projects located within the City of Los Angeles and City of West Hollywood (See Section III, Environmental Setting), is expected to increase the demand for fire protection services in the Project area. Of the 63 related projects, 41 are located in the City of Los Angeles and would place additional demands upon the LAFD. Specifically, there would be increased demand for additional LAFD staffing, equipment, and fire protection services over time. These services would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the Proposed Project and related projects would contribute. The remaining 22 related projects located within the City of West Hollywood would be serviced by Los Angeles County Fire Department (LACoFD). Each related project served by LACoFD would be required to satisfy response distance, emergency access, and fire flow requirements of the Los Angeles County Fire Code.

There are 63 related projects within the 1.5 mile service response distance from the Project Site. The fire stations that service the Project Site would be reasonably expected to also serve the 41 related projects located within the City of Los Angeles. Each of the 41 related projects within the LAFD service area would be required to satisfy the response distance, emergency access, and fire flow requirements pursuant to the LAMC. If the acceptable response distance is exceeded, each project would be subject to LAMC Section 57.503.3.3, which requires the installation of automatic fire sprinkler systems. Similar to the Proposed Project, each of the related projects in the LAFD service area would be individually subject to review by the City of Los Angeles Planning Department, Bureau of Engineering, and LAFD, and would be required to comply with all applicable construction-related and operational fire safety requirements. With respect to emergency

access, the design of each related project would be evaluated individually in coordination with their respective jurisdictional agencies to ensure that adequate emergency access is provided.

With regard to facilities and equipment, similar to the Proposed Project, the 41 related projects within the City of Los Angeles would be required to implement all applicable Building Code and Fire Code requirements regarding structural design, building materials, site access, fire-flow, storage and management of hazardous materials, and alarm and communications systems. Compliance with applicable 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. Compliance with applicable regulatory requirements would ensure that adequate fire prevention features would be provided and reduce demand on LAFD facilities and equipment. The related projects may also include the installation of automatic fire sprinklers to enhance fire safety that would further reduce the demand placed on the LAFD facilities and equipment.

With regard to response distance, given that the Project Site is located within an urban area, each of the related projects within the geographic scope would likewise be developed within urbanized locations serviced by one or more existing fire stations. Additionally, in accordance with Fire Code requirements, if a related project would not be within the acceptable distance from a fire station, that related project would be required to install an automatic fire sprinkler system to comply with response distance requirements. Similarly, as with the Proposed Project, the related projects would be required to comply with all applicable Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review prior to the issuance of a building permit.

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 3.b.(1) above, the obligation to provide adequate fire protection and emergency medical services 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 the Proposed Project either because of the Proposed Project or 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 CEQA Guidelines Section 15301 or 15332 and would not be expected to result in significant impacts.30 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. ***On this basis, the Proposed Project and related projects would not have a cumulatively significant impact to fire protection services, and, the Project's incremental effect would not be cumulatively considerable. As such, impacts on fire protection services would be less than significant.***

(2) Mitigation Measures

Cumulative impacts with regard to fire protection services would be less than significant. Thus, no mitigation measures would be necessary.

(3) Level of Significance After Mitigation

Impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

IV. Environmental Impact Analysis

H. Public Services

2. Police Protection

1. Introduction

This section analyzes the Proposed Project's potential impacts upon police protection services. Police protection services in the Project area are provided by the City of Los Angeles Police Department (LAPD). The information below is based, in part, on the crime reporting statistics as published by the LAPD and includes statistical data regarding police protection facilities and services. Additionally, LAPD's correspondence letter (dated April 1, 2019) and a supplemental correspondence letter (dated February 20, 2020) for the Proposed Project are provided as Appendix G.2 to 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, as well as the City of Los Angeles (City). As described below, these plans and guidelines include California Constitution Article XII, the California Vehicle Code (CVC), the Los Angeles General Plan Framework, the City of Los Angeles Charter and Administrative and Municipal Codes, and the Wilshire Community Plan.

(1) 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 used exclusively for local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services

include police protection. Section 30056 provides 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 police protection, 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*, 843, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection services, and that it is reasonable to conclude that a lead agency will comply with this section and ensure that public safety services are provided.[17]

(b) California Vehicle Code

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incidents/calls.[18] This section of the CVC states the following:

> *Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as otherwise directed by a traffic officer, do the following: (a)(1) Except as required under paragraph (2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and thereupon shall stop and remain stopped until the authorized emergency vehicle has passed. (2) A person driving a vehicle in an exclusive or preferential use lane shall exit that lane immediately upon determining that the exit can be accomplished with reasonable safety…. (c) All pedestrians upon the highway shall proceed to the nearest curb or place of safety and remain there until the authorized emergency vehicle has passed.*

(2) Regional

(a) County of Los Angeles Office of Emergency Management

The Office of Emergency Management (OEM), established by Chapter 2.68 of the County Code, is responsible for organizing and directing emergency preparedness efforts, as well as the day-to-day coordination efforts, for the County's Emergency Management

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

[18] *A Code 3 response to any emergency may be initiated when one or more of the following elements are present: a serious public hazard, an immediate pursuit, preservation of life, a serious crime in progress, and prevention of a serious crime. A Code 3 response involves the use of sirens and flashing red lights.*

Organization.[19] The OEM's broad responsibilities include, among others, planning and coordination of emergency services on a countywide basis.

The County organizes a formal mutual aid agreement among all police departments within its jurisdiction to provide police personnel and resources to assist other member agencies during emergency and/or conditions of extreme peril. Formal mutual aid requests between police departments can be made under the purview of the Los Angeles County Sheriff's Department (LACSD); however, additional informal agreements may be made directly between the police agencies.

(3) Local

(a) City of Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (General Plan Framework), originally adopted in December 1996 and re-adopted in August 2001, provides a comprehensive vision for long-term growth within the city and guides subsequent amendments of the City's Community Plans Specific Plans, zoning ordinances, and other local planning programs.[20]

Chapter 9 of the General Plan Framework addresses Infrastructure and Public Services. Goal 9I states that every neighborhood should have the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood. Related Objective 9.13 and Policy 9.13.1, which implement Goal 9I, require the monitoring and reporting of police statistics and population projections for the purpose of evaluating existing and future needs. Objective 9.14 requires that adequate police services, facilities, equipment, and personnel be available to meet existing and future public needs. Policies related to Objective 9.14 generally provide guidance for public agencies. Objective 9.15 requires police services to provide adequate public safety in emergency situations by maintaining mutual assistance relationships with local law enforcement agencies, state law enforcement agencies, and the National Guard.

(b) Wilshire Community Plan

The Wilshire Community Plan contains the following police protection objectives, policies and programs applicable to the Project Site:

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[19] *County of Los Angeles, Chief Executive Office, Office of Emergency Management, https://ceo.lacounty.gov/emergency-management/#. Accessed January 2020.*

[20] *City of Los Angeles Department of City Planning, The Citywide General Plan Framework Element, originally adopted in 1995, re-adopted in 2001.*

- Goal 8: Continue to provide the Wilshire Community with adequate police facilities and services to protect its residents for criminal activity, reduce the incidence of crime, and provide other necessary law enforcement services.

- Objective 8-1: Provide adequate police facilities, personnel and protection to correspond with existing and future population and service demands.

  - Policy 8-1.1: Consult with the LAPD in the review of new development projects and land use changes to determine law enforcement needs and requirements.

- Objective 8-2: Improve the ability of the community and police department to minimize crime and provide adequate security for all residents.

  - Policy 8-2.1: Support and encourage community based crime prevention efforts (such as Neighborhood Watch) through regular interaction and coordination with existing policing, foot and bicycle patrols, community watch programs, and regular communication with neighborhood and civic organizations.

  - Policy 8-2.2: Provide adequate lighting around residential, commercial and industrial buildings, and park, school, and recreational areas to improve security.

  - Policy 8-2.3: Ensure that landscaping around buildings does not impede visibility and provide hidden places which could foster criminal activity.

(c) The City of Los Angeles Charter and Administrative and Municipal Codes

The City Charter, Administrative Code, and LAMC identify law enforcement regulations and the powers and duties of the LAPD. City Charter Article V, Section 570 gives the power and the duty to the LAPD to enforce the penal provisions of the Charter, City ordinances, and state and federal laws. The Charter also gives responsibility to the LAPD to act as peace officers and to protect lives and property in case of disaster or public calamity.

Section 22.240 of the Administrative Code requires the LAPD to adhere to the state standards described in Section 13522 of the California Penal Code, which charges the LAPD with the responsibility of enforcing all LAMC Chapter 5 regulations related to fire arms, illegal hazardous waste disposal, and nuisances (such as excessive noise), and providing support to the Department of Building and Safety Code Enforcement inspectors and the LAFD in the enforcement of the City's Fire, Building, and Health Codes.

b) Existing Conditions

(1) Overview of Existing LAPD Service Area and Bureaus

The LAPD service area covers approximately 473 square miles and is divided into four geographic bureaus: Central Bureau, West Bureau, South Bureau, and Valley Bureau.[21] These four bureaus are further divided into 21 service areas, which are serviced by the LAPD's 21 community police stations.[22] The LAPD is the local law enforcement agency responsible for providing police protection services to the Project Site and immediate Project vicinity. As of September 2019, the departmental staffing resources within the LAPD includes 9,985 sworn officers. Based on a total City population of 4,007,147, the LAPD citywide officer-to-resident ratio is 2.5 officers for every 1,000 residents.[23]

The Project Site is located within the service area of LAPD's West Bureau, which oversees operations in five communities including the Wilshire area. Under the jurisdiction of the West Bureau, the Wilshire Community Police Station serves the Project Site. The Wilshire Community consists of Arlington Heights, Brookside Park, Carthay Circle, Country Club Park, Fairfax, Greater Wilshire, Hancock Park, Larchmont Village, Little Ethiopia, Melrose, Mid-City, Mid-Wilshire, Miracle Mile, Park La Brea, South Carthay, Wellington Square, Wilshire Center, Wilshire Vista, and Windsor Square.[24] A location map depicting the Project Site in relation to the Wilshire Community Police Station and station service area is presented in Figure IV.H-2, Police Station Location Map.

(2) LAPD Community Police Station

The Wilshire Community Police Station is located at 4861 W. Venice Boulevard, approximately 2.5 miles southeast of the Project Site. Correspondence with the LAPD, Community Relationship Division, indicates that the Wilshire Community Police Station is approximately 11 minutes from the Project Site without traffic. The Wilshire geographic area is approximately 13.97 square miles and consists of approximately 233 sworn personnel and 28 civilian support staff. The Wilshire geographic area is a culturally diverse community with a population of approximately 251,000 persons. The officer to resident ratio is 1 officer to 1,076 residents in the Wilshire Area. Additionally, there are special service teams available within the LAPD to serve the Wilshire Area. Special services include an emergency response system at the Wilshire Station, which is directly linked to the LAPD Communications Division's Dispatch Centers. The Communications

[21] *City of Los Angeles, LAPD, COMPSTAT Plus, accessed April 2019.*
[22] *LAPD, LAPD Organization Chart, www.lapdonline.org/inside_the_lapd/content_basic_view/1063, accessed November 15, 2019.*
[23] *LAPD, COMPSTAT Citywide Profile 10/06/19 to 11/02/19.*
[24] *City of Los Angeles, LAPD, COMPSTAT Plus, Wilshire Community Police Station Profile, accessed March 2019.*

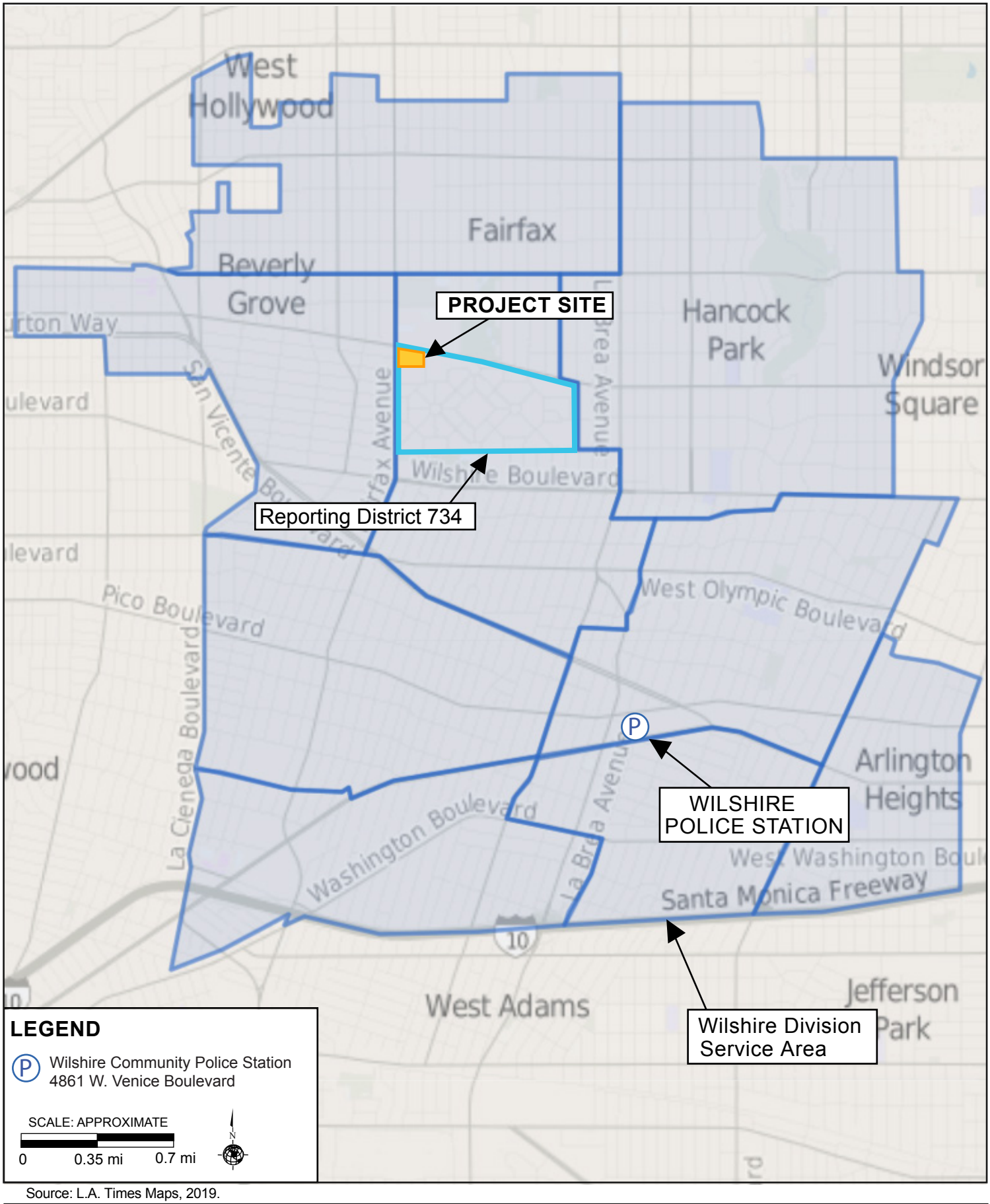
Division has the responsibility to staff and answer, on a 24-hour basis, the telephones upon which calls for service are received. This includes 911 emergency calls (police, fire, and paramedic). The average response time to high priority emergency calls (Code 3 calls) for the service in the Wilshire Area during 2018 was 4.2 minutes with a dispatch median time of 1.4 minutes.[25] The medium high priority response time for non-emergency calls (Code 2 calls) for service in Wilshire Area during a four week period in January and February 2020 was 33.6 minutes, with a dispatch median time of 14.8 minutes.[26] The LADP has indicated that these response times are adequate performance times for this police division.[27] The LAPD did not identify any proposed capital improvement plans for the construction or expansion of police facilities in the Project area.[28]

Furthermore, as stated above, as with all municipal police departments in Los Angeles County, the LAPD participates in the Mutual Aid Operations Plan for Los Angeles County, a reciprocal agreement between signatory agencies including local police departments to provide police personnel and resources to assist other member agencies during emergency and/or conditions of extreme peril.

(3) LAPD Crime Statistics

The LAPD posts annual crime statistics, which are reported and organized by each police station. Table IV.H-4, Wilshire Area Crime and Arrest Statistics, provides crime statistics for the Wilshire Area and compares the crime statistics from 2016 through 2020. As shown in Table IV.H-4 a total of 6,846 crimes were reported in the Wilshire area for 2019, or roughly 0.027 crimes per capita. Table IV.H-5, provides a comparison of the total crimes in the Wilshire Area and the Citywide crimes per capita for the year 2019. The written correspondence from LAPD identifies property-related crimes, burglaries, and other thefts as the most frequent crimes in the Wilshire Division.

[25] *City of Los Angeles Police Department, Community Outreach and Development Division, Crime Prevention Through Environmental Design Division, Updated Requested crime Statistics for the 3rd and Fairfax Project, dated February 20, 2020*
[26] *Ibid.*
[27] *Ibid.*
[28] *Ibid.*



Source: L.A. Times Maps, 2019.

Figure IV.H-2
Police Station Location Map

Table IV.H-4
Wilshire Area Crime and Arrest Statistics

Crime and Arrests	2020 [a]	2019	2018	2017	2016
Violent Crimes					
Homicide	1	2	6	7	5
Rape	1	57	88	84	82
Robbery	31	417	446	412	352
Aggravated Assault	54	521	546	504	436
Subtotal Violent Crimes	***87***	***997***	***1,086***	***1,007***	***875***
Property Crimes					
Burglary	78	845	1,084	1,066	891
Motor Vehicle Theft	44	496	526	546	584
Burglary Theft from Vehicle	171	1,990	1,561	1,432	1,269
Personal / Other Theft	187	2,039	2,215	1,880	1,661
Subtotal Property Crimes	***480***	***5,370***	***5,386***	***4,924***	***4,405***
Child/Spousal Abuse	50	479	549	486	475
Total Crimes	**617**	**6,846**	**7,021**	**6,417**	**5,755**

[a] Note the year 2020 statistics cited are from January 1 to February 8, 2020.
Source: City of Los Angeles Police Department, Supplemental Written Correspondence, dated February 20, 2020. See Appendix G.2, LAPD Correspondence.

The Wilshire area's crime rate of 0.027 crimes per capita, which is based on the number of crimes reported within a specified area with a given population, affects the needs projection for staff, facilities, and equipment for the LAPD. The data presented in Table IV.H-4 indicates a nine percent increase in crime between 2017 to 2018 and a two and one-half percent decrease in crime between 2018 and 2019.

Table IV.H-5
2019 Crimes – Wilshire Community and Citywide

Area	Crimes	Population	Crimes per Capita
Wilshire Area	6,846	251,000	0.027
Citywide	123,316	4,007,905	0.031

Source: City of Los Angeles Police Department, Supplemental Written Correspondence, dated February 20, 2020. See Appendix G.2, LAPD Correspondence.

3. Project Impacts

a) Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, a significant impact related to police protection would occur if a project would result in the following:

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

The L.A. CEQA Thresholds Guide (Thresholds Guide) identifies the following criteria to evaluate police protection services:

- 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 build-out compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (i.e. 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.

In assessing impacts related to police protection in this section, the City will use Appendix G as the thresholds of significance. The criteria identified above from the L.A. CEQA Thresholds Guide will be used where applicable and relevant to assist in analyzing the Appendix G thresholds.

b) Methodology

Demand for police services is directly affected by the size and characteristics of the community, population, the geographic area served, and the number and the type of calls for service. Changes in any one of these factors could affect demands for police protection services or the LAPD's ability to provide an acceptable level of service. For purposes of this analysis, the following section addresses the Project's effects on the ability of police personnel to adequately serve existing and future population in the Project vicinity, taking into consideration the Project's security and/or design features intended to reduce the demand for police protection services; and potential need for new or expanded

police facilities. As such, the determination of significance relative to impacts on police services is based in part on the evaluation of existing police services for the police station serving the Project Site, including the availability of police personnel to serve the estimated Project population. The analysis focuses on the increase in the residential population from the Proposed Project and presents statistical averages associated with the police station serving the Project Site and citywide services and, based on guidance from the LAPD. The determination of impact on the capability of existing police services and personnel is also based on the potential for the annual crimes per resident in the Wilshire Area to exceed current averages due to the addition of the Proposed Project.

The analysis presents statistical data for the Wilshire Community and citywide, including the ratio of crimes to residents and the ratio of officers to residents. The ratio of officers to residential population is used by LAPD as an indicator of the level of service offered and provides a basis for measuring the increase in policing required for the Proposed Project.

The LAPD does not provide crime rates or officer service ratios for non-residential uses and does not use such ratios to measure service levels. The non-residential population is calculated using Police Service Population Conversion Factors presented in the L.A. CEQA Thresholds Guide. The calculation is based on the increase in Project Site activity, netting out the existing commercial uses. The analysis reviews the Proposed Project characteristics and security and/or design features, and the use of on-site and private security provisions to reduce the potential effects of the Project on the need for police services. Based on these criteria, and consultation with the LAPD, a determination was made as to whether police facilities could accommodate the additional demand for police protection services resulting from the Proposed Project without the need for a new facility or the alteration of existing facilities.

The need for or deficiency in adequate police protection services in and of itself is not a CEQA impact, but a social or economic impact.[29] To the extent a project generates a demand for additional police services that results in the need to construct new facilities or expand existing facilities, and the construction could result in a potential impact to the environment, then that impact needs to be evaluated within the project EIR and mitigated (if feasible), if found to be significant. The ultimate determination of whether a project would cause a significant impact to the environment related to police services is determined based on whether construction of new or expanded police facilities would result in a reasonably foreseeable direct or indirect effect on the environment.

There are no current capital improvement plans for the construction or expansion of police facilities in the Project area. Therefore, the City makes the following assumptions based

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

on existing zoning standards and historical development of police facilities, that in the event the City determines that expanded or new police 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 under CEQA Guidelines Section 15301 or 15332, or Negative Declaration or Mitigated Negative Declaration.

c) Project Design Features

The following project design features are applicable to the Project.

PDF-POL-1: During construction, the Project applicant will implement temporary security measures, including security fencing (e.g., chain-link fencing), low-level security lighting, and locked entry (e.g., padlocked gates or guard-restricted access) to limit access by the general public. Regular security patrols during non-construction hours (e.g., nighttime hours, weekends, and holidays) will also be provided.

PDF-POL-2: Prior to the issuance of a building permit, the Project Applicant will submit a diagram of the Project Site to the LAPD Wilshire Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

PDF-POL-3: The Project will include nighttime security lighting of building entries and walkways, a closed circuit security camera system monitored by on-site professional security, and secure parking facilities with sufficient lighting to maximize visibility and reduce areas of concealment.

d) Analysis of Project Impacts

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

(1) Impact Analysis

(a) Construction Impacts

Construction of the Proposed Project would not generate a permanent population at the Project Site that would substantially increase the police service population of the Wilshire

Area since the daytime population generated at the Project Site during construction would be temporary in nature. When not properly secured, construction sites can attract criminal activity and adversely affect local law enforcement. The Proposed Project has the potential to adversely affect police services during the construction period due to the potential for trespassers, theft, and vandalism, which could potentially result in graffiti, excess trash, and potentially unsafe conditions for the public. Implementation of Project Design Feature PDF-POL-1, above, would provide construction fencing and screening of the construction activity from view at the local street level and locked entry to limit access by the general public. With implementation of these security measures, the potential demand on police protection services at the Project Site associated with theft and vandalism during construction would be reduced.

Construction activities could also potentially affect LAPD response due to reduced capacities of adjacent streets. As discussed in Section IV.J, Transportation, of this Draft EIR, while most construction activities are expected to be primarily contained within the boundaries of the Project Site, it is expected that construction fences would encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site. As such, sidewalks along S. Ogden Drive from W. 3rd Street to the Project Site's southern property line would be closed on a temporary basis during construction. Signs would be posted advising pedestrians of temporary sidewalk closures and providing alternative routes (e.g., a sign or signs would direct pedestrians to use the sidewalk on the east side of S. Ogden Drive as an alternative route). However, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. Also, given the permitted hours of construction and nature of construction projects, most of the construction worker trips would occur outside of the typical weekday commuter morning and afternoon peak periods, thereby reducing the potential for traffic-related conflicts. In addition, as discussed in Section IV.J, Transportation, of this Draft EIR, a Construction Traffic Control/Management Plan would be implemented during Project construction pursuant to Project Design Feature PDF-TRAFFIC-1 in Section IV.J, Transportation, of this Draft EIR, to ensure that adequate and safe access is available within and near the Project Site during construction activities. The Plan shall identify the location of any roadway closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. Appropriate construction traffic control measures (e.g., detour signs, delineators, flag persons, etc.) would also be utilized, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, construction-related traffic generated by the Project would not significantly impact LAPD response to the Project Site and vicinity as emergency vehicles have the ability to avoid traffic by using sirens to clear a path of travel or driving in the lanes of opposing traffic, pursuant to CVC Section 21806.

Based on the above, temporary construction activities associated with the Proposed Project would not generate demand for additional police protection services that would substantially exceed the capability of LAPD to serve the Project Site, nor would the Project construction cause a substantial increase in emergency response times as a result of increased traffic congestion. Therefore, during construction, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services. ***Impacts on police protection services during Proposed Project construction would be less than significant, and no mitigation measures are required.***

(b) Operation Impacts

The Proposed Project has the potential to place additional demands upon police protection services during its operation due to the increased activity and new land uses on the Project Site. The Proposed Project would include up to 331 dwelling units and approximately 83,994 square feet of new commercial space. A total of 151,048 square feet of existing retail space would be demolished, and its historical usage factors have been accounted for in the baseline assumptions in this section. For purposes of estimating the Proposed Project's impact upon the LAPD service population, the service population demands of the Proposed Project was calculated based on the American Community Survey (ACS) Public Use Microdata Sample (PUMS) data the City of Los Angeles citywide average population for multifamily housing (see Section IV.G, Population and Housing in this Draft EIR). As shown in Table IV.H-6, below, the Proposed Project is estimated to generate a net service population of 1,120 persons including 319 employees and 801 residents. Based on the Proposed Project's residential component, the officer to population service ratio for the Wilshire Area would increase from one officer per 1,076 residents to one officer per 1,081 residents.

Table IV.H-6
Estimated Proposed Project LAPD Service Population

Land Use	Units (DU or sf)	Conversion Factor	Service Population (capita)
Existing Uses to be Removed			
Community Retail	144,963 sf	2/1,000 sf [a]	290
Restaurant	6,085 sf	4/1,000 sf [a]	24
Subtotal	***151,048 sf***		***314*** *(0 residents)*
Proposed Land Uses			
Residential	331 DU	2.42 [b]	801
Employees	426,994 sf	--[b]	319
Subtotal Proposed Project			**1,120** (801 residents)
Net LAPD Service Population			**801** (801 residents)

Notes:
sf = square feet, DU = dwelling units
[a] *Employment rate is based on the City of Los Angeles VMT Calculator Documentation, Table 1: Land Use and Trip Generation Base Assumptions, November 2019 (see Section IV.G, Population and Housing).*
[b] *Based on the American Community Survey (ACS) Public Use Microdata Sample (PUMS) data the City of Los Angeles citywide average population for multifamily housing is estimated to be 2.42 persons per household. (Jack Tsao, Department of City Planning Demographic Unit, July 31 2019). (see Section IV.G, Population and Housing).*
Source: Parker Environmental Consultants, 2020.

The number of calls requesting police responses to retail burglaries, vehicle burglaries, damage to vehicles, and traffic-related incidents of crimes against persons may increase with the increase in on-site activity. Based on the assumption that the annual crime rate in the Wilshire Area would remain constant at 0.027 crimes per capita, the Proposed Project's residential service population could potentially generate approximately 21 new crimes per year.[30] The LAPD correspondence letter indicates that the project size would only have a minor impact on police services in the Wilshire area. The LAPD assessment is consistent with the minor numeric increase in crimes per year that is generated by typical population growth and changed land uses on the Project Site. The LAPD correspondence also does not indicate that the increases in people, or potential crime events, that could occur on the Project Site would result in the need for new or altered LAPD facilities.

In addition, as a mixed-use project, the Proposed Project would provide an increased community presence compared to the existing conditions, which consists of surface

[30] *Based on a service population of 801 residents and the annual crime rate of 0.027 crimes per capita (801 persons x 0.027 crimes/person = 43 crimes).*

parking and 151,048 square feet of retail land uses on the Development Site. The Proposed Project would also include strategically positioned low-level and security lighting to enhance public safety (See Project Design Feature POL-PDF-3, above). Visually obstructed and infrequently accessed "dead zones" will be limited and, where possible, security systems will be installed to limit public access. As provided in Project Design Feature PDF-POL-3, the Proposed Project will also include nighttime security lighting of building entries and walkways, private on-site security patrols, a closed circuit security camera system, and secure parking facilities with sufficient lighting to maximize visibility and reduce areas of concealment. As noted in Project Design Feature PDF-POL-2, the Applicant will also submit a diagram of the Project Site to the LAPD's Wilshire Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

Furthermore, emergency vehicles, including LAPD responders would access the Project Site directly from the surrounding roadways on S. Fairfax Avenue, W. 3rd Street and S. Ogden Drive. Operation of the Project would not include the installation of barriers (e.g. perimeter fencing, fixed bollards, etc.) that could impede emergency access within the vicinity of the Project Site. As such, emergency access to the Project Site and surrounding uses would be maintained at all times. Project-related traffic would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by the additional traffic congestion. However, when responding to incidents emergency response vehicles use sirens and flashing lights to clear a path of travel, and if necessary, can drive in the lanes of opposing traffic.[31] As such, the Proposed Project's operation and increase in traffic would not hinder emergency response times when it is operational. In addition to the implementation of project design features PDF-POL-1 through PDF-POL-3, above, the Proposed Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. ***Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, the need for new of physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services. Impacts to police services from Project operation would be less than significant.***

[31] *See California Vehicle Code (CVC) Section 21806.*

(2) Mitigation Measures

The Proposed Project's impacts with regard to police protection services would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

(1) Impact Analysis

Based on a review of the related projects list, 41 projects occur within the City of Los Angeles and 22 occur within the City of West Hollywood. Police protection services within the City of Los Angeles are provided by the LAPD, while police protection services in the City of West Hollywood are provided by the Los Angeles County Sherriff's Department. As such, the Proposed Project would not be serviced by the Los Angeles County's Sherriff Department, since the Project Site is not located within its jurisdiction. The Proposed Project would have no cumulative impact upon the Los Angeles County Sherriff's Department. Likewise, the related projects located within the City of West Hollywood would have no impact upon the LAPD services.

In general, impacts to LAPD 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 that of nearby related projects, coordination among these multiple construction sites would be required and implemented through each development's construction management plan, as developed in consultation with LADOT, 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 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 during construction. Furthermore, the Project vicinity and general Wilshire Area are highly urbanized and it is assumed that each of the related projects identified, as well as other future development within the Wilshire Area would likewise be currently serviced by existing police stations. Therefore, the Project and related projects do not propose to introduce new populations into currently underserved areas necessitating a new facility. Therefore, cumulative construction impacts on police protection facilities would be less than significant.

The Proposed Project, in combination with service population growth from the 41 related projects located in the City of Los Angeles (see Section III, Environmental Setting), would increase the demand for LAPD services in the Project Site area at the Proposed Project buildout year (2023). Table IV.H-7, Estimated Cumulative LAPD Service Population, provides a summary of the cumulative per capita service population for the related projects that are located in the LAPD's Wilshire service area. As noted in Table IV.H-7, below, the related projects would generate a cumulative service population of 8,310 persons including 5,924 residents. Combined with the Proposed Project's service population, the cumulative increase in service population would be 9,116 persons, including 6,725 new residents. Assuming the same 233 sworn personnel, the resulting officer to resident ratio would increase from 1,076 residents per officer to 1,106 residents per officer. These are conservative estimates because they do not take into account existing development, and any associated existing resident population to be removed due to the development of the cumulative projects. The additional population associated with related projects and general growth in the Project area would likewise have an effect on crime in the Wilshire Area, which could increase based on per capita crime rates. Based on the 2019 crime rate for the Wilshire area (i.e., 0.027 crimes per person), the cumulative impact generated by the Proposed Project, combined with the related projects, is estimated to result in an increase of 182 crimes per year.[32]

Similar to the Proposed Project, each of the related projects within the City of Los Angeles would be individually subject to review by the LAPD and would be required to comply with all applicable safety requirements of the enforcement and monitoring agencies in order to address police protection services demands adequately. Impacts created by new development would be reduced by the incorporation of required security measures into each proposed development. Further, the continuous presence of people and activity on-site and in the Project area could deter criminal activity. The LAPD also monitors the need for police services and proposes appropriate service enhancement through the yearly budgetary process.

[32] *Calculated as follows: 6,725 new residents multiplied by 0.027 (crime rate per person) = 182 new crimes.*

Table IV.H-7
Estimated Cumulative LAPD Service Population

Land Use	Units [a]	Conversion Factor [b]	Service Population (capita)
Related Project Land Uses			
Residential	2,448 DU	2.42/DU [c]	5,924
Retail	175,187 sf	2 employees / 1,000 sf	350
Medical Office	160,462 sf	3 employees / 1,000 sf	481
General Office	134,889 sf	4 employees / 1,000 sf	540
Grocery/Supermarket	27,685 sf	4 employees / 1,000 sf	111
Hotel	176 rooms	0.5 employees / room	88
Church/Synagogue	16,582 sf	-- [d]	19
Hospital/Assisted Living	283 beds	1.85 employees / bed	524
Museum	8,729 sf	-- [e]	135
Restaurant	34,501 sf	4 employees / 1,000 sf	138
Subtotal Related Projects			**8,310** (5,924 residents)
Subtotal Proposed Project			**806** (801 residents)
Total Cumulative Service Population			**9,116** (6,725 residents)

Notes:
Units are in sf = square feet, DU = dwelling units.
[b] *Employment rates based on LADOT's City of Los Angeles VMT Calculator Documentation, Table 1: Land Use and Trip Generation Base Assumptions, November 2019. Cumulative calculations are provided in Appendix N of this Draft EIR.*
[c] *Based on the American Community Survey (ACS) Public Use Microdata Sample (PUMS) data the City of Los Angeles citywide average population for multifamily housing is estimated to be 2.42 persons per household. (See Table IV.G-4, Proposed Project Housing and Population Estimates, in Section IV.G, Population and Housing).*
[d] *The total employment generation for church/synagogue uses is based on the environmental documents on file with the City of Los Angeles, Department of City Planning for Related Project No. LA 17 (ENV-2018-1651-MND and Related Project No. LA 27 (ENV-2019-1857-EIR).*
[e] *The total employment generation for museum uses is based on the data provided for Related Project No. LA 8 (See Table III-1, Related Projects).*
Source: Parker Environmental Consultants, 2020 (See Appendix N, Cumulative Population, Housing and Employee Calculations).

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 3.b.(1) above, the obligation to provide adequate police protection is the responsibility of the City. Through the City's regular budgeting efforts, LAPD's resource needs, including service enhancement that may become necessary to achieve the required level of service, would be identified and allocated according to the priorities at the time. At this time, LAPD 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 LAPD 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 1.0 acre in size; and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under 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 police protection services would be less than significant. ***On this basis, the Proposed Project and related projects would not result in a cumulatively significant impact to police protection services, and, the Project's incremental effect would not be cumulatively considerable. As such, impacts on police protection services would be less than significant.***

(2) Mitigation Measures

Cumulative impacts with regard to police protection services would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

IV. Environmental Impact Analysis

H. Public Services

3. Schools

1. Introduction

This section analyzes the Proposed Project's potential impacts upon the Los Angeles Unified School District (LAUSD) and the local schools servicing the Project area. The purpose of this section is to analyze whether the Proposed Project would result in substantial adverse physical impacts created by the provision of new, or physically altered school facilities required in order to maintain acceptable performance objectives. The analysis presented in this section is largely based on information provided by LAUSD (see Appendix G.3 to this Draft EIR). To the extent that the Proposed Project would result in any direct impacts to existing schools or school facilities (e.g., detours to pedestrian routes, air quality impacts, construction noise impacts, etc.), such impacts are addressed in each respective section of this EIR according to the applicable thresholds of significance.

2. Environmental Setting

a) Regulatory Framework

(1) California Education Code

Educational services for the Project are subject to the rules and regulations of the California Education Code and governance of the State Board of Education. The State also provides funding through a combination of sales and income taxes. In addition, pursuant to Proposition 98, the State is also responsible for the allocation of educational funds that are acquired from property taxes. Further, 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.[33]

[33] *California Education Code Section 17620(a)(1).*

(2) Senate Bill 50

Pursuant to California Education Code Section 17620(a)(1), 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 Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to any adjudicative act or a legislative act by any state or local agency relating to the planning, use, or development of real property (e.g., zone changes, general plan amendments, development permits and subdivisions). The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA or other State or local laws (Government Code Section 65996). SB 50 also permits the governing board of any school district 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 Los Angeles Unified School District (LAUSD) 2018 Developer Fee Justification Study has been prepared to support the school district's levy of the fees authorized by Section 17620 of the California Education Code.[34] The LAUSD Developer Fee Justification Study demonstrates that the LAUSD requires the full statutory impact fee to accommodate student impacts from development activity, to be consistent with Section 17620 of the California Education Code.[35]

(3) Los Angeles Unified School District

As indicated above, the State is primarily responsible for the funding and structure of the local school districts, and in this case, LAUSD. As LAUSD provides education to students in many cities and county areas, in addition to the City, its oversight is largely a district-level issue. Public schools operate under the policy direction of elected governing district school boards (elected from the local area) as well as by local propositions which directly impact the funding of facility construction and maintenance. Pursuant to SB 50, LAUSD collects developer fees for new construction within its boundaries.

(4) Open Enrollment Policy

The open enrollment policy is a state-mandated policy that enables students anywhere in the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated "open enrollment" seats. The number of open enrollment seats is determined annually, and transfers are issued on a space-available basis. Open enrollment seats are granted

[34] *Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018.*
[35] *Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018.*

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.

(5) Wilshire Community Plan

As discussed in Section IV.E, Land Use and Planning, of this Draft EIR, the Project Site is located within the Wilshire Community Plan ("Community Plan") area of the City of Los Angeles. The Wilshire Community Plan, adopted on September 19, 2001, includes the following objective and policies that are relevant to schools:

> **GOAL 6:** Facilitate the provision of public schools and adequate school facilities to serve every neighborhood in the Wilshire Community Plan area.
>
> **Objective 6-1:** Locate schools in areas complimentary to existing surrounding land uses with buffering, convenient to local neighborhoods, and with access to recreational opportunities.
>
> > **Policy 6-1.1:** Encourage compatibility between school locations, site layouts, architectural designs, and local neighborhood character.
> >
> > **Policy 6-1.2:** Encourage public school design that buffers classrooms from noise sources.
> >
> > **Policy 6-1.3:** Expansion of existing public school facilities should be considered prior to acquisition of new sites.
>
> **Objective 6-2:** Continue to work constructively with the LAUSD to promote the siting and construction of adequate public school facilities phased with anticipated population growth in the Wilshire Community Plan Area.
>
> **Objective 6-3:** Maximize the use of public schools for neighborhood use, and of local open space and parks for public school use.

b) Existing Conditions

(1) Los Angeles Unified School District

Public education services are provided within the Project area by LAUSD. The LAUSD is the largest (in terms of number of students) public school system in California and the second-largest in the United States. The LAUSD encompasses approximately 710 square miles and serves the City of Los Angeles, along with all or portions of 26 other cities, as well as several unincorporated areas of Los Angeles County. Approximately 4.8 million

people live within the LAUSD's boundaries.[36] The LAUSD provides kindergarten through high school (K–12) education to a total of 557,560 students with a total enrollment of 673,849 students when including adult education, special day classes, special education schools, and early education, enrolled throughout 1,386 schools and centers, including: 19 primary school centers, 441 elementary schools, 79 middle schools, 92 senior high schools, 54 option schools, 53 magnet schools, 25 multi-level schools, 13 special education schools, two home/hospital, 239 K-12 magnet centers (on regular campuses), 228 charter schools, and 142 other schools and centers.[37] As of July 1, 2019, the LAUSD employed 66,523 personnel, 25,418 are teachers, 2,545 are administrators, 29,900 are classified personnel, and 5,146 are other certificated support personnel.[38] The LAUSD Fiscal Year 2019-2020 total budget was around $7.87 billion.[39]

The LAUSD Facilities Services Division (FSD) is responsible for the execution of the District's bond programs, the maintenance and operations of schools, the utilization of existing assets, and planning for future capital needs. Five local school construction and repair bond measures, Proposition BB and Measures K, R, Y and Q, passed by the voters within LAUSD boundaries provide the majority of the funds for FSD's bond program, valued at $26.2 billion. Although the sources of funds for the bond program include all of the local bonds approved by voters, a significant portion of Measure Q has not yet been fully issued, nor has more than $412 million in Measure R and Y bonds. During the most recent bond issuance in February 2018, LAUSD sold approximately $1.2 billion of Measure Q bonds and $130 million of Measure Y bonds.[40]

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[36] *Los Angeles Unified School District, Fingertip Facts 2019-2020, https://achieve.lausd.net/facts, accessed January 2020.*

[37] *Los Angeles Unified School District, Fingertip Facts 2019-2020, https://achieve.lausd.net/facts, accessed January 2020.*

[38] *Los Angeles Unified School District, Fingertip Facts 2019-2020, https://achieve.lausd.net/facts, accessed January 2020.*

[39] *Los Angeles Unified School District, Fingertip Facts 2019-2020, https://achieve.lausd.net/facts, accessed January 2020.*

[40] *Los Angeles Unified School District, Facilities Services Division, Strategic Execution Plan 2019, https://www.laschools.org/documents/download/about_fsd/sep/2012_consolidated_strategic_execution_plan/2019_Facilities_Services_Division_SEP.pdf?version_id=321808143, accessed January 2020.*

Until recently, the primary goal of the bond program had been to reduce overcrowding by providing students with the opportunity to attend a neighborhood school operating on a traditional, two-semester calendar.[41] This goal was met with the development of 131 new schools for K-12 students, allowing students to attend schools in their neighborhoods that operate on a traditional two-semester calendar.[42]

The LAUSD is divided into six local districts (Central, East, Northeast, Northwest, South, West). The Project Site is located within the LAUSD Local District West. As shown in Table IV.H-8, the Project Site is currently served by one elementary school (Hancock Park Elementary School), one middle school (John Burroughs Middle School), and one high school (Fairfax Senior High School). The locations of these schools are shown in Figure IV.H-3, School Location Map. Table IV.H-9, below, shows the current enrollment and capacities of these schools.

Table IV.H-8
Resident Schools Serving the Project Site

School Name	Grades	Address	Distance (miles)
Hancock Park Elementary School	K-5	408 S. Fairfax Avenue	0.1
John Burroughs Middle School	6-8	300 S. McCadden Place	1.8
Fairfax Senior High School	9-12	7850 Melrose Avenue	1.0

Source: Los Angeles Unified School District, Resident School Identifier, website: http://rsi.lausd.net/ResidentSchoolIdentifier/, accessed November 2018.
Los Angeles Unified School District, Written Correspondence, dated May 16, 2018.

[41] *Los Angeles Unified School District, Facilities Services Division, FSD Bond Program, http://www.laschools.org/new-site/, accessed January 2020.*

[42] *Los Angeles Unified School District, Facilities Services Division, Strategic Execution Plan 2019, https://www.laschools.org/documents/download/about_fsd/sep/2012_consolidated_strategic_execution_plan/2019_Facilities_Services_Division_SEP.pdf?version_id=321808143, accessed January 2020.*

Source: Yahoo Maps, 2018; Parker Environmental Consultants.

Figure IV.H-3
School Location Map

Table IV.H-9
Current 2017-2018 Enrollment and Capacity of Schools Serving the Project Site

School Name [a]	Current Capacity [b]	Resident Enrollment [c]	Actual Enrollment [d]	Current Seating Overage/ (Shortage) [e]	Overcrowded Now? [f]
Hancock Park Elementary School	749	762	719	(13)	Yes
John Burroughs Middle School	1,561	1,596	1,796	(35)	Yes
Fairfax Senior High School	2,045	1,847	1,929	198	No

Notes:
[a] *School's Name*
[b] *School's operating capacity. The maximum number of students the school can serve with the school's classroom utilization. Excludes capacity allocated to charter co-locations. Includes capacity for magnet programs.*
[c] *The total number of students living in the school's attendance area and who are eligible to attend the school at the start of the reported school year, plus students enrolled at any on-site magnet centers.*
[d] *The number of students actually attending the school at the start of the reported school year, including magnet students.*
[e] *Reported school year seating overage or (shortage): equal to (capacity) - (resident enrollment).*
[f] *Reported school year overcrowding status of school. The school is overcrowded if any of these conditions exist:*
-There is a seating shortage.
-There is a seating overage of LESS THAN or EQUAL TO a margin of 20 seats.
Source: Los Angeles Unified School District, Written Correspondence, Re: Environmental Impact Report Information Requested for: 3rd and Fairfax Mixed-Use Project, May 16, 2018. (See Appendix G.3)

(2) Private and Charter Schools in the Project Vicinity

The Project area is also served by several private schools and charter schools within a two-mile radius. These schools are identified in Table IV.H-10, below. As shown, there are approximately 32 private and charter schools located in close proximity to the Project Site. 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 residing in the state of California who wishes to attend. If the number of students who wish to attend a charter school exceeds the school's capacity, the school determines admission based on a lottery. LAUSD has over 277 independent and affiliated charter schools within its jurisdiction, serving over 138,000 students in grades kindergarten through 12th grade.

Table IV.H-10
Private and Charter Schools in the Project Vicinity

School Name	Grades	Address
Fusion Academy Miracle Mile	6-12	5757 Wilshire Boulevard
Futures Academy – Beverly Hills	6-12	8484 Wilshire Boulevard
Ohel Chana High School	9-12	7659 Beverly Boulevard
Bais Yaakov School for Girls	9-12	7353 Beverly Boulevard
Shalhevet High School	9-12	910 S. Fairfax Avenue
Harkham-gaon Academy	9-12	5870 W. Olympic Boulevard
Bnos Esther	9-12	356 N. Formosa Avenue
Cathedral Chapel School	K-8	755 S. Cochran Avenue
Gindi Maimonides Academy	Preschool-8	310 Huntley Drive
Yeshiva Gedolah of Los Angeles	9-12	5444 W. Olympic Boulevard
Pressman Academy	Preschool-8	1055 La Cienega Boulevard
Yeshiva Rav Isacson/Torath Emeth Academy	Preschool-8	555 La Brea Avenue
Yeshiva Ohr Elchonon Chabad	9-12	7215 Waring Avenue
Mesivta Birkas Yitzchok	9-12	6022 Pico Boulevard
St. Mary Magdalen	5-8	1223 S. Corning Street
Temple Emanuel Academy Day School	K-6	8844 Burton Way
Torat Hayim Hebrew Academy	Preschool-8	1210 La Cienega Boulevard
Yavneh Hebrew Academy	Preschool-8	5353 W. 3rd Street
Ohr Haemet Institute	9-12	1030 S. Robertson Boulevard
Rejoice in Jesus Christian School	1-8	1304 S. Cochran Avenue
Wilshire Private School	K-6	4900 Wlshire Boulevard
Holy Spirit Elementary School	Preschool-4	1418 S. Burnside Avenue
Cheder Menachem	Preschool-8	1606 La Cienega Boulevard
West Hollywood College Preparatory School	Preschool-12	1317 N. Crescent Heights Boulevard
Pacific Hills School	6-12	8628 Holloway Drive
STAR Prep Academy	6-12	1518 S. Robertson Boulevard
Yeshivat Ohr Chanoch	8-12	8906 W. Pico Boulevard
Bais Chaya Mushka	K-8	9051 W. Pico Boulevard
Hillel Hebrew Academy	Preschool-8	9120 W. Olympic Boulevard
Marlborough School	7-12	250 S. Rossmore Avenue
Kabbalah Children's Academy	Preschool-8	9250 W. Olympic Boulevard
Yula Girls High School	9-12	1619 S. Robertson Boulevard

Note: Some schools require an application process prior to student enrollment. Schools identified are located within a 2-mile radius of the Project Site.
Source: www.privateschoolreview.com, accessed November 2018.

3. Project Impacts

a) Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a significant impact would occur if a project would result in the following:

Threshold 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.

The L.A. CEQA Thresholds Guide identifies the following criteria to evaluate impacts on schools:

a) The population increase resulting from the Project, based on the net increase of residential units or square footage of non-residential floor area;

b) 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 (i.e., facilities, equipment and personnel) and the project's proportional contribution to the demand;

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

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

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.

b) Methodology

The analysis of environmental impacts of a project upon schools is determined based on the enrollment and capacity of existing and reasonably foreseeable proposed schools in a project area, and the number of students that would be generated by the Proposed Project upon full buildout and occupancy. The existing and projected enrollment and capacity data for the schools and programs serving the Project Site were obtained from the Schools Enrollment and Capacities Report provided by the LAUSD in their May 16, 2018 correspondence (See Appendix G.3 to this Draft EIR).

The anticipated number of students that would be generated by the Proposed Project upon full buildout and occupancy was calculated by applying the rates from the 2018 LAUSD Developer Fee Justification Study.[43] Based on these projections, it is determined

[43] *Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018.*

whether a project would exceed the capacity of any existing or proposed school such that a new or expanded school would be needed. The analysis addresses all levels of education facilities operated by LAUSD (i.e., elementary, middle, and high schools) and focuses on the schools that would serve the Project Site. It also addresses state regulations and cumulative development fees as a mechanism for providing new school facilities and addressing school impacts of the Project.

c) Project Design Features

No specific project design features are proposed with regard to schools.

d) Analysis of Project Impacts

Threshold a) Would the Project 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 service ratios, response times or other performance objectives for schools?

(1) Impact Analysis

(a) Construction

The Proposed Project would generate part-time and full-time jobs during construction activities. 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 temporary construction job opportunities presented by the Proposed Project. Construction employment generated by the Proposed Project would not result in a substantial increase in the resident population or notable increase in demand for schools in the vicinity of the Project Site. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools.

Impacts to school facilities during the Proposed Project construction would be less than significant.

(b) Operation Impacts

The Proposed Project would result in the development and operation of 331 new multi-family housing units with an estimated 801 new residents. As there are no students currently residing on the Project Site, the Project's student generation would result in a net increase in students attending Project area schools. Table IV.H-11, Proposed Project Estimated Student Generation, includes student generation rates for commercial uses and multi-family residential uses and existing and proposed on-site land uses were factored to estimate the number of school-age student generation for existing and future conditions. As indicated in Table IV.H-11, below, the Proposed Project is estimated to generate approximately 114 elementary students, 31 middle school students, and 65 high school students. As discussed in Section II, Project Description, of this Draft EIR, the Proposed Project includes removal of 151,048 square feet of commercial space. As shown in Table IV.H-11, using the applicable LAUSD student generation rates, the existing uses on the Project Site produce approximately 71 students, consisting of 39 elementary school students, 11 middle school students, and 21 high school students. When accounting for the removal of the existing on-site uses, the Proposed Project would result in a net increase of 139 students, consisting of 75 elementary school students, 20 middle school students, and 44 high school students. It is likely that some of the students generated by the Proposed Project already reside in areas served by LAUSD and are enrolled in LAUSD schools; and it is likely that those students would not change to a new school because of the Proposed Project. Furthermore, a portion of the Project's school-aged children would possibly attend non-LAUSD schools (e.g., private or charter schools), thus reducing attendance at LAUSD schools. However, to provide a conservative analysis, it is assumed that all students generated by the Proposed Project would be new to the LAUSD school system.

The projected student enrollment, and seat capacities for the schools serving the Project Site for the 2022-2023 school year, is listed in Table IV.H-12, based on the information provided by the LAUSD Facilities Services Division.

Table IV.H-11
Proposed Project Estimated Student Generation

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total Students
Existing Uses (to be removed)					
Commercial (151,048 sf) [b]	314 emp	39	11	21	71
Total Existing Students:		**39**	**11**	**21**	**71**
Proposed Project					
Multi-Family [a]	331 du	75	20	43	138
New Commercial (83,994 sf) [b]	319 emp	39	11	22	72
Total Project Student Generation:		**114**	**31**	**65**	**210**
Less Existing Students:		*-39*	*-11*	*-21*	*-71*
NET Student Generation:		**75**	**20**	**44**	**139**

Notes: sf = square feet; du = dwelling units; emp = employees

[a] *Student generation rates are as follows for multi-family residential uses: 0.2269 elementary, 0.0611 middle and 0.1296 high school students per unit.*

[b] *Table 15 of the 2018 Developer Fee Justification Study provides a rate of 0.2249 students per employee to calculate the total students per non-residential land use. Since the LAUSD Developer Fee Justification Study does not specify different student generation rates for each grade level type for non-residential land uses, the number of students for each grade level type was divided among the elementary, middle, and high schools with the same ratio as the residential generation (55% elementary school, 15% middle school, and 30% high school).*

Source: Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018.

The information provided by LAUSD provides enrollment and capacity information for existing conditions in the 2017-2018 school year, as well as, anticipated enrollment in a five-year horizon based on the number of students living in the schools attendance area and who are eligible to attend school as of the start of the school year.

As shown in Table IV.H-9, Fairfax Senior High School is below capacity in the existing conditions based on the resident enrollment data (2,045 capacity compared to resident enrollment of 1,847 = 198 students). LAUSD considers “resident enrollment” to be the total number of students in the school’s attendance area, and who are eligible to attend the school at the start of the reported school year, plus students enrolled at any on-site magnet centers. Fairfax Senior High School also has capacity in the horizon year.

John Burroughs Middle School is considered over capacity based on resident enrollment in the existing conditions (1,561 capacity compared to resident enrollment of 1,596 = 35 students), but would not be considered beyond capacity at Project build out in 2023. Hancock Park Elementary School is considered over capacity (749 capacity compared to

Table IV.H-12
Projected Enrollment and Capacity of Schools
Serving the Project Site (2022-2023 School Year)

School Name [a]	Capacity [b]	Projected Resident Enrollment Without Project [c]	Projected Seating Overage/ (Shortage) Without Project [d]	Project Generated Students [e]	Projected Resident Enrollment With Project	Projected Seating Overage/ (Shortage) With Project [f]
Hancock Park Elementary School	749	758	(9)	75	833	(84)
John Burroughs Middle School	1,561	1,259	302	20	1279	282
Fairfax Senior High School	2,045	1,792	253	44	1,836	209

Notes:
[a] *School Name.*
[b] *School's operating capacity. The maximum number of students the school can serve with the school's classroom utilization. Excludes capacity allocated to charter co-locations. Includes capacity for magnet programs.*
[c] *Projected 5-year total number of students living in the school's attendance area and who are eligible to attend the school as of the start of the school year. Includes magnet students.*
[d] *Projected seating overage or (shortage): equal to (capacity) - (projected enrollment), without the Proposed Project.*
[e] *See Table IV.H-11, Proposed Project Estimated Student Generation.*
Projected overcrowding status of school. The school will be considered overcrowded in the future if any of these conditions exist:
-There is a seating shortage in the future.
-There is a seating overage of less than or equal to a margin of 20 seats in the future.
[f] *Projected seating overage or (shortage): equal to (capacity) - (projected enrollment), with the Proposed Project.*
Source: Los Angeles Unified School District, Written Correspondence, dated May 16, 2018.

resident enrollment of 762 = 13 students) based on resident enrollment in the existing condition. The school is also considered over capacity (749 capacity compared to horizon resident enrollment of 758 = 9 students) in the horizon year without the Proposed Project.

Students generated by the Proposed Project may be eligible to use private and charter schools in the vicinity of the Project Site, existing LAUSD facilities and other LAUSD options, including the following:

- Open Enrollment Transfers – Students anywhere within LAUSD may apply to any regular, grade appropriate LAUSD school with designated open enrollment seats.
- The Permits With Transportation Program – A voluntary program that provides students with integrated experiences by placing Hispanic, Black, Asian and Other Non-Anglo students in integrated settings while providing opportunities for Other

White (OW) students to attend Predominantly Hispanic, Black, Asian and Other Non-Anglo (PHBAO) schools. Transportation is provided.

- Intra-District Permits – Students may attend another school within the LAUSD boundaries based on parent employment, safety and protection, childcare, specialized program.
- Sibling permits that enable students to enroll in a school where a sibling is already enrolled.
- Magnet and Permits with Transportation – All students within LAUSD boundaries are eligible to apply and attend an LAUSD Magnet.[44]

The LAUSD Schools Enrollments and Capacities Report (which is in response to the service inquiry for the Proposed Project) regarding the schools serving the Project Site states that no new school construction is planned. Thus, based on LAUSD data, the Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facility because no such facility is planned based on existing or horizon year conditions. Furthermore, even if such a facility were to be planned by LAUSD, that facility would undergo the applicable environmental review and be subject to the LAUSD Capital Improvement program, which is also referenced in the LAUSD service correspondence regarding the Proposed Project.

In addition, the Proposed Project is subject to the development impact fees established by SB 50, which requires the Project Applicant to pay fees to the LAUSD prior to the issuance of the Project's building permit. Pursuant to Government Code Section 65995, the mandatory payment of developer fees to the LAUSD " . . . is deemed to provide full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." Therefore, pursuant to state law, the developer's payment of school impact fees to the local school district, in an amount established by the school district, would address school capacity impacts.

Here, the manner in which LAUSD would accommodate existing, and potential new students resulting from the Proposed Project, is subject to separate planning and CEQA review by LAUSD. Any related impacts are mitigated through the Project Applicant's payment of fees to LAUSD pursuant to SB 50. Upgrades to existing schools and the construction of new schools is addressed by the LAUSD's Facilities Services Division, which is responsible for the execution of its current bond programs, the maintenance and

[44] *Los Angeles Unified School District, Unified Enrollment, website: https://apply.lausd.net, accessed February 2020.*

operations of schools, the utilization of existing assets, and master planning for future capital projects.[45] The Facilities Services Division Strategic Execution Plan (2018) outlines the New School Construction Plan, the Repair and Modernization Program, the Joint Use/Innovation Fund and Charter Facilities Program, the Capital Improvement Program and the Capital Needs Assessment Master Planning and Facilities Condition Assessment.

Therefore, although John Burroughs Middle School and Hancock Park Elementary School are considered overcrowded in the existing and projected conditions, the mandatory payment of school impact fees would be considered full mitigation of the Proposed Project's impacts. ***Therefore, the Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools.***

(2) Mitigation Measures

The Proposed Project impacts upon school services would be less than significant with the payment of development impact fees to LAUSD prior to the issuance of building permits pursuant to SB 50. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

(1) Impact Analysis

The Proposed Project is anticipated to increase the demand for skilled construction-related jobs during its construction. However, the employment patterns of construction workers in Southern California are such that it is not likely that they would relocate their households as a consequence of the construction employment associated with the Proposed Project. As a result, it is likely that the skilled workers anticipated to work on the Proposed Project already reside within the region and would not need to relocate as a result of employment. Overall, construction employment related to the Proposed Project

[45] *Facilities Services Division, Los Angeles Unified School District, website: https://www.laschools.org/new-site/, accessed April 2019.*

and the related projects would be temporary and would not induce substantial permanent population growth or relocate their children to the nearby schools. Therefore, the potential for construction workers to increase student generation is unlikely, and school impacts associated with population growth due to temporary construction jobs would be less than significant.

The Proposed Project and the 63 related projects within the City of Los Angeles and City of West Hollywood are expected to result in a cumulative increase in the demand for LAUSD school services.

Together, the 63 related projects within the City of Los Angeles and City of West Hollywood would have the potential to generate students that would attend the same schools as the Proposed Project. As shown below in Table IV.H-13, the 63 related projects and Proposed Project would generate approximately 1,267 elementary students, 343 middle school students and 712 high school students for a total of 2,322 students. Of the 2,332 students generated by the Proposed Project and related projects, the Proposed Project would generate 139 students which represents approximately six percent of the cumulative students generated (see Table IV.H-13, below). The impacts of cumulative development on local schools is likely to be overstated, since the projected population increase from cumulative projects is conservative, as this analysis does not take into account projects that would not be constructed and occupied within the timeframe analyzed, projects that may be reduced in size, or demolition of existing housing to accommodate the planned new development. Further, many of the employees and residents generated by the 41 related projects within the City of Los Angeles may already reside in areas served by the LAUSD and would have students that may already be enrolled in LAUSD schools. It can also be reasonably expected that some new students would attend private schools, which are not accounted for in the LAUSD student capacity statistics presented in Table IV.H-13, below.

Furthermore, as with the Proposed Project, each of the 63 related projects would be expected to pay the required developer school fees to their respective school district (pursuant to SB 50) to reduce any impacts they may have on school services. While cumulative development would appear to cause new student generation to exceed current seating capacity, the provisions of SB 50, discussed above, are considered to

Table IV.H-13
Estimated Cumulative Student Generation

Land Use	Size [b,c]	Elementary School Students	Middle School Students	High School Students	Total Students
Dwelling Units [a]	2,937 du	666	179	381	1,226
Commercial Uses (Retail, Health Club, and Market Uses)	1,656 emp	205	56	112	373
Office (232,340 sf)	929 emp	115	31	63	209
Medical Office (160,462 sf)	481 emp	59	16	32	107
Hospital / Assisted Living	524 emp	65	18	35	118
Hotel	171 emp	21	6	12	39
Church/Synagogue	19 emp	4	1	2	7
Museum	135 emp	17	5	9	31
Restaurant (80,945 sf)	324 emp	40	11	22	73
Related Projects Total:		***1,192***	***323***	***668***	***2,183***
Proposed Project Net Total:		75	20	44	139
Cumulative Total:		**1,267**	**343**	**712**	**2,332**

Notes: du = dwelling units; emp = employees

[a] *Student generation rates are as follows for residential uses: 0.2269 elementary, 0.0611 middle and 0.1296 high school students per unit.*

[b] *The number of employees in the City of Los Angeles and West Hollywood were estimated using calculations from LADOT's City of Los Angeles VMT Calculator Documentation, Table 1: Land Use and Trip Generation Base Assumptions, November 2019.*

[c] *It is assumed that 0.2249 students are generated per commercial and industrial employee (Table 15 of the Developer Fee Justification Study). Since the LAUSD Developer Fee Justification Study does not specify the grade levels of students that are generated from non-residential land uses, the total number of students was divided among the elementary, middle, and high schools with the same ratio as the residential generation (55% elementary school, 15% middle school, and 30% high school).*

Source: Los Angeles Unified School District, 2018 Developer Fee Justification Study, March 2018.

provide full and complete mitigation of school facilities impacts. ***Impacts from the Project and related projects would not be cumulatively significant, and the Project's incremental effect would not be cumulatively considerable. Impacts would be less than significant.***

(2) Mitigation Measures

Cumulative impacts upon school services would be less than significant with the payment of development fees for schools to LAUSD prior to the issuance of building permits pursuant to SB 50. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

IV. Environmental Impact Analysis

H. Public Services

4. Parks and Recreation

1. Introduction

This section addresses the Proposed Project's potential impacts upon the City's public recreation infrastructure and parks and is based, in part, on the applicable policies of the Public Recreation Plan, which is part of the Service Systems Element of the General Plan, and the open space code provisions of the LAMC. The section below also incorporates information from the Department of Recreation and Parks Early Consultation Meeting Verification Letter, dated May 23, 2018 (Appendix G.4 to this Draft EIR).

2. Environmental Setting

a) Regulatory Framework

(1) State

(a) The Quimby Act

California Government Code Section 66477 (Quimby Act) was enacted by the California legislature in 1965 to promote the availability of park and open space areas in response to California's rapid urbanization and the need to preserve open space and provide parks and recreation facilities in response to this urbanization. The Quimby Act authorizes cities and counties to enact ordinances, which would require the dedication of land or payment of fees for park and recreational purposes for project involving residential subdivisions. The Quimby Act states that the dedication of land, or payment of fees, or both, shall not exceed the proportionate amount necessary to provide three acres of park area per 1,000 persons residing within a subdivision, unless the amount of existing neighborhoods or community park area exceeds that limit.[46]

[46] *California Government Code, Section 66477 (Quimby Act).*

(2) Local

(a) City of Los Angeles Quimby and Parkland Fees

As authorized under the State Quimby Act, on September 7, 2016, the City Council approved the Parks Dedication and Fee Update Ordinance, Ordinance No. 184,505 to mitigate the park- and open space-related impacts of new residential development projects. The Parks Dedication and Fee Update Ordinance applies to all new residential dwelling units and joint living and work quarters, except affordable housing units and secondary dwelling units in single-family zones. The Ordinance states that subdivision projects consisting of more than 50 residential units are subject to a Quimby in-lieu fee. All other residential projects are subject to a park mitigation fee. In lieu of paying a park fee, land may be dedicated to the City of Los Angeles for public park and recreational facility purposes, at the City's discretion. The effective date of the Park Fee Ordinance is January 11, 2017. The Proposed Project would be subject to Ordinance 184,505, which requires the payment of park mitigation fees for residential, non-subdivision projects. In accordance with Ordinance 184,505, these fees may be offset or reduced based on the amount of on-site open space and recreational amenities provided on-site.

LAMC Section 12.33 provides a discussion of the type of fees, subject properties, and formula for calculating parkland dedication and/or payment of fees. The Park Fee Ordinance amends Sections 12.21, 12.33, 17.03, 17.12 and 17.58 of the LAMC, deletes Sections 17.07 and 19.01 of the LAMC, and adds Section 19.17 of the LAMC.

(b) Los Angeles Municipal Code - Required Open Space

The LAMC provides minimum standards for the amount of "open space" that residential projects are required to provide on-site. Open space includes both common and private greenspace and recreational amenities that meet specific standards. However, it should be noted that not all areas designed as open space in the LAMC would be classified as park or recreational space under the City's Quimby and Parkland fee programs, under the General Plan Framework Element, or by the DRP.

Pursuant to LAMC Section 12.21(G), new construction in the City of six or more dwelling units on a lot is required to provide a minimum of 100 square feet of usable open space for each dwelling unit having less than three habitable rooms; 125 square feet for each dwelling unit having three habitable rooms; and 175 square feet for each dwelling unit having more than three habitable rooms. Usable space is defined as an area which is designed and intended to be used for active or passive recreation. Usable open space may consist of private and/or common area open space; however, common open space areas must be a minimum of 400 square feet and must constitute at least 50 percent of the total open space provided. Open space does not generally include parking areas,

driveways, or required front and side yards. A minimum of 25 percent of the common open space area shall be planted with ground cover, shrubs, or trees and at least one 24-inch box tree is required for every four dwelling units.

Additionally, pursuant to LAMC Section 12.33 C.1, applicants are required to participate in early consultation with the DRP staff, and Department of City Planning staff, in advance of submitting a tract map application for a project of more than 50 residential dwelling units. Pursuant to LAMC Section 12.33 D, the City may require residential subdivision projects to dedicate land for park and recreational purposes, pay a fee in-lieu, or provide a combination of land dedication and in-lieu fee payment for the purposes of acquiring, expanding and improving park and recreational facilities for new residents.

(c) LAMC Section 21.10.3 (Dwelling Unit Construction Tax)

LAMC Section 21.10.3 establishes the payment of a dwelling unit construction tax of $200 per new residential unit. The tax is to be paid to a "Park and Recreational Sites and Facilities Fund" for the acquisition and development of park and recreational sites/facilities. If park and recreation provisions (i.e. fees, improvements, or land dedication) have been provided pursuant to LAMC Section 17.12, the fair market value of those provisions is credited against the payment of this tax.

(d) Wilshire Community Plan

The Wilshire Community Plan, adopted on September 19, 2001, includes the following objective and policies that are relevant to parks and recreation:

GOAL 4: ***Provide adequate recreation and park facilities to meet the needs of residents in the Wilshire Community Plan area.***

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

Policy 4-1.1: Preserve and improve the existing recreational facilities and park spaces.

Policy 4-1.2: Encourage the shared use of other public facilities for recreational purposes.

Objective 4-2: Provide facilities for specialized recreational needs by utilizing existing public lands such as utility easements, Department of Water and Power properties, and unused or underutilized rights-of-way.

Policy 4-2.1: Underutilized public lands should be considered for open space and recreational purposes.

Objective 4-3: Ensure the accessibility, security and safety of parks by their users, particularly families with children and senior citizens.

Policy 4-3.1: Ensure that parks are adequately policed, monitored, maintained and illuminated for safe use at night, as appropriate.

GOAL 5: ***provide sufficient open space in balance with development to serve the recreational, environmental, health and safety needs of the Wilshire community, and to protect environment and aesthetic resources.***

Objective 5-1: 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 to provide a balance to urban development.

(e) Open Space and Conservation Chapter of the Framework Element

The Framework Element contains goals, objectives, and policies for the provision, management, and conservation of Los Angeles' open space resources, addresses the outdoor recreation needs of the City's residents, and are intended to guide amendments of the General Plan's Open Space and Conservation Element. Policy 9.23.5 directs the RAP to "[r]eevaluate the current park standards and develop modified standards which recognize urban parks, including multi-level facilities, smaller sites, more intense use of land, public/private partnerships and so on." In addition, Policy 9.23.8 instructs the RAP to "[p]repare an update of the General Plan Public Facilities and Services Element based on the new Los Angeles Department of Recreation and Parks standards by 2005."

(f) Open Space Element (Open Space Plan)

The Open Space Plan, adopted June 1973, provides an official guide to the City Planning Commission, the City Council, the Mayor, other governmental agencies and interested citizens for the identification, preservation, conservation and acquisition of open space in the City. The Plan designates existing open space land in public and private ownership. Also designated are lands, which are considered to be particularly desirable for open space use. Goals of the Plan include:

- To insure the preservation and conservation of sufficient open space to serve the recreational, environmental, health and safety needs of the City.
- To conserve unique natural features, scenic areas, cultural and appropriate historical monuments for the benefit and enjoyment of the public.

- To provide an open space system which provides identity, form and a visual framework to the City.
- To conserve and/or preserve those open space areas containing the City's environmental resources including air and water.
- To provide access, where appropriate, to open space lands.

(g) Public Recreation Plan

Originally adopted in 1980 by the Los Angeles City Council and most recently amended in September 2016, the Public Recreation Plan, a component of City's General Plan, sets forth recreational guidelines intended to provide a basis for satisfying the needs for City recreational sites. 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.

The Public Recreation Plan (PRP) emphasizes neighborhood, community and regional recreational sites and parks because of their importance to the daily lives of the City's people. In addition, the PRP elevates the importance of regional parks as community resources for active and passive recreational activity.

As set forth in the PRP, neighborhood recreational sites and facilities should provide spaces and amenities for outdoor and indoor recreational activities. Such facilities should serve residents of all ages and abilities in the immediate neighborhood and should be based on local community preferences and allow for both active and passive recreation. In accordance with the PRP, community recreational sites and facilities should be designed to serve residents of all ages and abilities in several surrounding neighborhoods and typically offer recreational facilities for organized activities in addition to amenities provided for neighborhood sites and facilities. Regional recreational sites and facilities provide specialized recreational facilities that have regional draw. Finally, the PRP states that school playgrounds may supplement local recreational sites.

The PRP's guidelines state that recreational sites and facilities should be provided at a broad range of levels that collectively help communities reach a recommended overall provision of 10 acres of land per 1,000 persons. In addition, the location and allocation of acreage for neighborhood, community, and regional recreational sites and facilities should be determined by the DRP on the basis of the service radius within residential areas throughout the City. The recommended service levels for both neighborhood sites

and facilities and community sites and facilities are two acres per 1,000 residents.[47] In addition, the recommended service levels for regional recreational sites and facilities are six acres per 1,000 residents. The PRP parkland guidelines are Citywide goals and do not constitute requirements for individual development projects.

The City's programs to implement the PRP include the following:

- Continue to include land acquisition for park and recreational purposes as a regular item in the City's Five Year Capital Improvement Program;
- Prepare a priority schedule based on greatest need for acquiring and developing park and recreational sites;
- Seek federal, state, and private funds to implement the acquisition and development of parks and recreational facilities;
- Establish policies to facilitate donation of parks to the City;
- Lease or acquire unused abandoned properties suitable for recreational activities; and
- Encourage multiple use of public properties such as power line or floor control rights of way, debris basins, reservoir sites, etc., for recreation.

b) Existing Conditions

(1) Existing Recreation and Park Facilities Serving the Project Area

The DRP is responsible for managing all municipally owned and operated recreation and parks facilities, maintaining over 16,000 acres of parkland, including, but not limited to, 444 neighborhood and regional parks, 422 playgrounds, 321 tennis courts, 184 recreation centers, 72 fitness areas, 62 swimming pools and aquatic centers, 30 senior centers, 26 skate parks, 13 golf courses, 12 museums, 9 dog parks, 187 summer youth camps, 13 lakes, 92 miles of hiking trails, and hundreds of programs for youth, seniors, the physically disabled and volunteers.[48]

[47] *City of Los Angeles Department of Planning, Public Recreation Plan, website: http://cityplanning.lacity.org/Code_Studies/GeneralElement/PublicRecreationPlan.pdf, accessed November 2018.*

[48] *City of Los Angeles Department of Recreation and Parks, Department, website: https://www.laparks.org/department/who-we-are, accessed November 2018.*

(a) Los Angeles Department of Recreation and Parks 2009 Citywide Community Needs Assessment

In 2009, the LADRP commissioned an update of the last Recreation and Parks Needs Assessment from 1999 as a preliminary step in developing a citywide park master plan and five-year capital improvement plan. The report provides an inventory of existing facilities, defines geographic areas of need and recommended facilities to serve specific populations, and identifies priorities for additional parks and recreation facilities. According to the DRP 2009 Citywide Community Needs Assessment, parkland acreage totals exceed 37,000 acres within City limits. Total acreage by category is shown in Table IV.H-14, below.

Table IV.H-14
City of Los Angeles Recreation and Parks Facility Inventory

Category	Total Acres	Total Acres Per 1,000 Persons
Mini Parks	50.76	0.013
Neighborhood Parks	773.72	0.198
Community Parks	2,763	0.759
Regional and Large Urban Parks	33,889	8.261
Total Parks	**37,477**	**9.231**

Source: City of Los Angeles Department of Recreation and Parks, 2009 Citywide Community Needs Assessment, website: https://www.laparks.org/sites/default/files/projects/2009%20Community%20Needs%20Assessment%20-%20Final.pdf , accessed November 2018.

As Table IV.H-14 shows, the total acres of mini parks, neighborhood parks and community parks in the City of Los Angeles are well below the standards of the Public Recreation Plan, and the City is deficient in parkland. The 2009 Citywide Community Needs Assessment identifies the need for neighborhood and community parks and indicates that the amount of existing neighborhood and community parkland in the City is low relative to the density of the City. The area near the Project Site is urbanized and developed and also falls below the parkland ratio.

The 2009 Citywide Needs Assessment also found that the City's over 420 parks and facilities are not equitably distributed throughout the City and many communities do not have parks within a reasonable distance. The DRP recognizes the need to develop a coordinated long-term initiative to meet the recreation needs of current, and future, residents of the City.

Following the Assessment, the City initiated the 50 Parks Initiative to increase the number of parks and facilities, with a specific focus on densely populated neighborhoods and

communities that lack sufficient open space and recreational services.[49] The purpose of this initiative is to substantially increase the number of parks and facilities available across the City, with a specific focus on densely populated neighborhoods and communities that lack sufficient open space and recreational services. With the 50 Parks Initiative, many new parks have been built and are continually being built throughout the City. Based on a 50 Parks Initiative Study, the new parks have improved the health of local residents, increased property values for the affected neighborhoods, perceived no significant impacts on local crime, and provided spaces for social interaction where no space previously existed.[50] As of 2017, according to the Department of City Planning, 39 parks have been completed.[51]

(b) Local Parks Serving the Project Site

The Project Site is located within an urbanized area of the Wilshire Community Plan area. The Wilshire Community Plan recognizes that the public parks and recreational facilities in the area do not meet federal, state, or local standards to meet the needs of residents in the Wilshire Community Plan Area.[52] There are nine parks and seven recreation centers within a two-mile radius of the Project Site, totaling approximately 86 acres. These facilities include: Pan Pacific Park, Hancock Park, Carthay Circle Park, Fairfax Senior Citizen Center, Poinsettia Recreation Center, L.A High Memorial Park, Queen Anne Recreation Center, Laces Aquatics Center and Recreation Center, Claude Pepper Senior Citizen Center, Robertson Recreation Center. Table IV.H-15, Recreation and Park Facilities within the Project Area, below, shows the parks and recreation facilities within 2 miles of the Project Site, and includes information on park size, distance from the Project Site, and park amenities. Figure IV.H-4, City of Los Angeles Existing Parks Location Map, below, shows the location of each identified park. Additionally, there are also 80 neighborhood community parks located within a five-mile radius, and three regional parks located within a 10-mile radius.

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[49] *City of Los Angeles Department of Recreation and Parks, 50 Parks Initiative, www.laparks.org/50parks, accessed January 2020.*

[50] *Sol Price School of Public Policy, University of Southern California, The Los Angeles Parks Foundation: A Study of the 50 Parks Initiative, May 2014, website: https://www.laparks.org/sites/default/files/projects/LAPF%2050%20Parks%20Initiative%20Study%20-%20Final.pdf, accessed March 2020.*

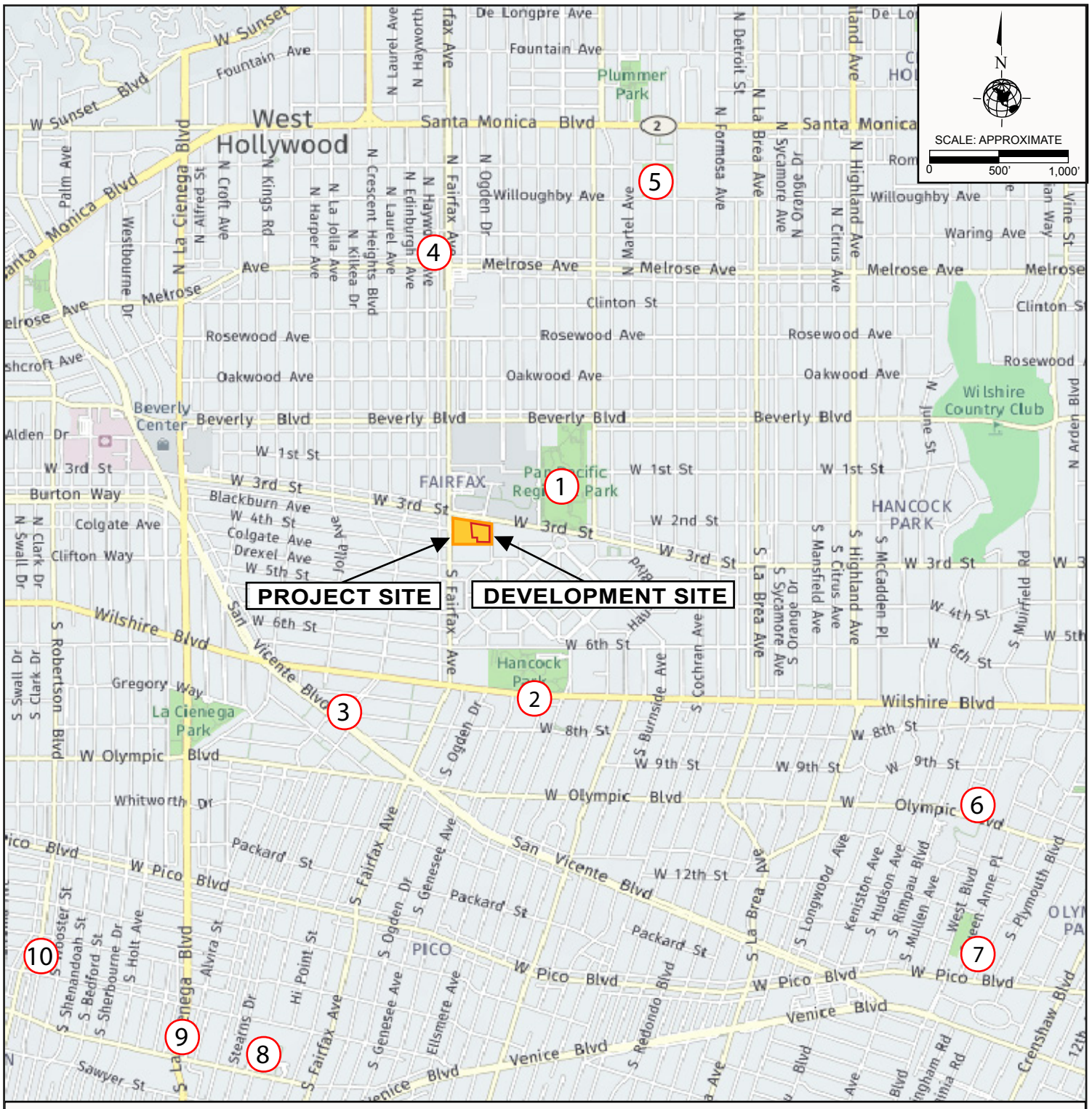
[51] *City of Los Angeles Department of City Planning, OurLA2040, Open Space Element Discussion Paper, 2017.*

[52] *City of Los Angeles, Wilshire Community Plan, p. III-13, last updated 2001.*

Table IV.H-15
Recreation and Park Facilities within the Project Area

Park Name	Park Type	Park Size (acres)	Park Amenities	Approx. Distance to Project Site (miles)
1. Pan Pacific Park, Recreation Center, Senior Activity Center and Pool	Regional	41.5	Barbecue Pits, Baseball Diamond, Basketball Courts, Children's Play Area, Picnic Tables, Restroom(s), Amphitheatre, Jogging Path, Kitchen, Multipurpose Sports Field, Outdoor Fitness Equipment, Stage, Basketball Courts, Senior Center, Seasonal outdoor pool	0.44
2. Hancock Park	Neighborhood	18.2	Walking paths, benches	0.47
3. Carthay Circle Park	Neighborhood	2.9	Gardens, Walking paths, Benches	0.58
4. Fairfax Senior Citizen Center	Community	0.4	Auditorium, Classroom(s), Kitchen, Community Room, Stage, Computer Lab	0.88
5. Poinsettia Recreation Center	Community	6.8	Baseball Diamond, Basketball Courts, Basketball Courts, Children's Play Area, Handball Courts, Tennis Courts, Kitchen, Outdoor Fitness Equipment, Stage	1.28
6. L.A. High Memorial Park	Neighborhood	2.6	Children's Play Area	1.57
7. Queen Anne Recreation Center	Community	4.52	Barbeque pits, baseball diamond, basketball courts, children's play area, tennis courts, kitchen	1.99
8. Laces Aquatics Center and Recreation Center	Community	7.5	Year round pool, Volleyball courts (lighted), Baseball diamond (lighted), basketball courts (lighted/indoor), Tennis courts (lighted), Basketball courts (lighted/outdoor), Dance room, Multipurpose sports field, Indoor gym (with weights)	1.99
9. Claude Pepper Senior Citizen Center	Community	0.4	Auditorium, Community Room, Picnic Tables, Classrooms, Computer lab, Kitchen, Library, Stage	2.00
10. Robertson Recreation Center	Community	1.2	Basketball courts (lighted/outdoor), Children's play area, Community room, Handball courts (lighted), Picnic tables, Kitchen	2.00
Total Parkland (Approximate):		**86.02**		

Sources: Parks and park amenities were determined using City of Los Angeles Department of Recreation and Parks, Facility Locator, http://www.laparks.org/, accessed November 2018; City of Los Angeles, Department of Public Works, NavigateLA, website: http://navigatela.lacity.org/navigatela/, accessed April 2019.



LEGEND

1. Pan Pacific Park/Recreation Center
2. Hancock Park
3. Carthay Circle Park
4. Fairfax Senior Citizen Center
5. Poinsettia Recreation Center
6. L.A. High Memorial Park
7. Queen Anne Recreation Center
8. Laces Aquatics and Recreation Center
9. Claude Pepper Senior Citizen Center
10. Robertson Recreation Center

Source: Yahoo Maps, 2018; Parker Environmental Consultants.

Figure IV.H-4
City of Los Angeles Existing Parks Location Map

3. Project Impacts

a) Thresholds of Significance

In accordance with the State CEQA Guidelines Appendix G, the Project would have a significant impact related to parks and recreation if it would:

Threshold a) Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government 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; or

Threshold 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

Threshold c) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

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

(a) The net population increase resulting from the Project;

(b) 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

(c) Whether the project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

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.

b) Methodology

The environmental impacts of a project upon parks and recreational facilities are determined based on the inventory of existing parks and recreational facilities within two miles of the Project Site and the ability of such facilities to accommodate a project's demands upon parkland and recreation services. This is calculated based on the City's recommended service ratios for parkland to population in the PRP, as well as project-specific recommendations from the DRP, as well as service standards set forth by the City's Quimby Act provisions, and the LAMC. The analysis addresses consistency of the Project with the requirements of these regulations and the role of the regulations is reducing potential Project impacts.

c) Project Design Features

No specific project design features beyond the open space and on-site amenity features described in Section II, Project Description, of this Draft EIR are proposed with regard to parks and recreation.

d) Analysis of Project Impacts

Threshold a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or need for new or physically altered government 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?

(1) Impact Analysis

(a) 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 Southern California, and the operation of the market for construction labor, 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 vicinity, or a corresponding permanent demand for parks and recreational 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 parks and recreational facilities that may be located in proximity to the Project Site (i.e., less than 0.5 mile). However, any resulting increase in the use of such parks and recreational facilities would be temporary and negligible. Furthermore, it is unlikely that workers would utilize parks and recreational facilities beyond a 0.5-mile radius from the Project Site, as lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes).

As shown in Figure IV.H-4, there are no parks or recreational facilities adjacent to the Project Site along Third Street or Fairfax Avenue. Therefore, Project construction would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project site, nor interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity. As described in Section II, Project Description, of this Draft EIR, the Project's anticipated haul routes would include use of W. 3rd Street east to La Brea Avenue southbound to/from the I-10 Freeway and W. 3rd Street east to La Brea Avenue northbound and Santa Monica Boulevard to Highland Avenue to access the US-101 (Hollywood Freeway). Therefore, use of this anticipated haul route would not be expected to result in access restriction to City parks and recreation facilities in the vicinity of the Project Site nor interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity.

Based on the above, Project construction would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services, nor would Project construction interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity. Thus, the Project would not require the need for new or physically altered government facilities, the construction of which would cause significant environmental impacts. Additionally, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities during construction such that substantial physical deterioration of the facilities would occur or be accelerated. ***As such, impacts related to parks and recreational facilities during Project construction would be less than significant, and mitigation measures are not required.***

(b) Operation

Development of the Proposed Project would include the construction of 331 residential dwelling units, and 83,994 square feet of new commercial space. It is estimated that the Proposed Project would result in an increase of up to 801 new residents to the Wilshire

Community Plan Area and could, therefore, create an additional demand on the parks and recreation facilities. The City's parkland ratio guideline is 2 acres of parks and open space per 1,000 residents for combined neighborhoods and community parks. When applied to the Proposed Project, the guideline generates a need for approximately 1.6 acres of public parkland or open space.

As discussed above, the Public Recreation Plan provides standards for the provision of park space. The Proposed Project would provide 37,225 sf (0.85 acres) of on-site recreational amenities and open space. Thus, the Proposed Project alone would not meet the PRP recommended Citywide service levels. However, these service levels are not requirements for individual development projects.

While the Proposed Project would not meet on-site park space per the PRP standards, as discussed further in the analysis below, the Proposed Project would be subject to and would comply with the regulatory provisions of the LAMC which require the dedication of parkland, payment of in-lieu fees, that would supplement on-site recreational facilities in compliance with the LAMC.

Nonetheless, some Project residents would still be expected to utilize other private or public parks and recreational facilities. As a result, the Proposed Project would result in an incremental increase in the use of area public parks and recreational facilities. However, given the number of parks in the vicinity, the impacts at any single park location would be minimal and the Proposed Project's contribution to park use would not cause substantial physical degradation of existing facilities or require a new public park.

The need for public parkland and open space can be met, pursuant to the LAMC, through a combination of on-site open space and amenity areas, and monetary contributions to the Park and Recreational Sites and Facilities Fund for the provision of recreation and park facilities in the Project vicinity (Quimby Fees). Providing on-site private open space and amenities relieves some demand on local public parks and open space.

The Proposed Project would provide approximately 37,225 square feet of on-site open space pursuant to the requirements of LAMC Section 12.21-G. Table IV.H-16 Summary of Required and Proposed Open Space Areas, below, provides a breakdown of the amount of open space that would be required and proposed for the Proposed Project.

Table IV.H-16
Summary of Required and Proposed Open Space Areas

Open Space Code Requirements			
Type	**Number of Units**	**Square Feet Required [a]**	**Total Square Feet Required**
Less than three habitable rooms (Studio Units and 1-bedroom units)	232	100 sf / du	23,200
Three habitable rooms (2-bedroom units)	66	125 sf / du	8,250
More than three habitable rooms (3-bedroom units)	33	175 sf / du	5,775
TOTAL OPEN SPACE REQUIRED			**37,225**

Open Space Proposed by the Project	Area Proposed
Level 4 Amenity	3,540 sf
Level 5 Amenity	2,100 sf
Level 4 Roof Deck	15,303 sf
Level 5 Roof Deck	14,134 sf
Level 7 Roof Deck	2,148 sf
TOTAL OPEN SPACE PROPOSED	**37,225 sf**

sf = square feet; du = dwelling unit
Notes:
[a] LAMC Section 12.21-G,2
Source: MVE + Partners, January 16, 2019.

The Project Site would incorporate a variety of indoor and outdoor common space and private open space areas and amenities to accommodate the needs of residents and visitors. As shown in Table IV.H-16, above, the Proposed Project would provide approximately 37,225 square feet (0.85 acres) of total common open space and amenities on-site, including, but not limited to, open space, a club room, fitness center, and three roof decks. Furthermore, it is anticipated that most Project residents would more frequently use on-site recreational amenities and open spaces rather than off-site public parks and recreational facilities due to convenience. In this way, the Project's provision of on-site recreational amenities and open space would reduce the use of area parks and recreational facilities by Project residents. The Proposed Project's open space and on-site amenity design features are identified in Section II, Project Description. The composite landscape plan is shown in Figure II-19 in Section II, Project Description. The locations of the provided open space and amenity space are shown in Figures II-13, Level 4 and 5 Floor Plans, and Figure II-15, Building Sections.

Providing on-site private open space and amenities would relieve some demand on local public parks and open space in the vicinity. In addition, the Proposed Project is required to pay applicable Quimby fees (LAMC 17.12) as well as a Dwelling Unit Construction Tax in accordance with LAMC Section 21.20.3(a)(1) for the construction of residential dwelling units. This fee would be deposited into a trust fund managed by the DRP for the sole

purpose of park and recreational facility acquisition, expansion, and improvement. These fees would directly fund park and recreational services on a community-wide level and specifically in the Community Plan area. Therefore, any impacts with respect to the demand on local parks and open space are mitigated through the Project Applicant's payment of Quimby fees and the LAMC's Dwelling Unit Construction Tax.

Furthermore, based on the DRP Early Consultation Meeting Verification Letter (dated May 23, 2018), the Proposed Project may be required to dedicate land for park and recreational purposes, pay a fee in-lieu, or provide a combination of land dedication and in-lieu fee payment for the purposes of acquiring, expanding and improving park and recreational facilities for new residents.[53] The exact park land dedication, an in-lieu fee, or a combination of both would be determined for the Proposed Project. The DRP would then prepare a report, with its recommendations for how the Proposed Project would meet its obligations with respect to parks. The dedication of park land or payment of fees in-lieu would mitigate any impacts to the local parks and would improve park and recreational facilities for future residents. As described above, the Project would be subject to the regulatory requirements of the LAMC which have been formulated to reduce impacts of new development on parks and recreation by requiring the dedication of parkland, payment of in-lieu fees, or provision of comparable on-site recreational facilities in compliance with the LAMC.

Therefore, neither construction or operation of the Proposed 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 government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for parks. As such, the Proposed Project's impact upon parks and recreational facilities would be less than significant.

(2) Mitigation Measures

Impacts with regard to recreation and park facilities would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

[53] *DPR's Early Consultation Meeting Verification letter is provided in Appendix G.4 to the Draft EIR.*

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?

(1) Impact Analysis

As noted in response to Appendix G Threshold Question a) above, the Proposed Project would result in an increase of up to 801 new residents to the Wilshire Community Plan Area and would, therefore, create an additional demand on existing parks and recreation facilities serving the project area. However, this demand would be offset, in part, by the provision of 37,225 square feet of on-site open space and amenities, including, but not limited to, a club room, fitness center, and three roof decks. Thus, while the Proposed Project's residents would be expected to utilize off-site public parks and recreational facilities to some degree, the Proposed Project would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and on-site amenity features. Furthermore, the Pan Pacific Park and Recreation Center, which is a 41.5-acre regional park located within 0.5 mile of the Project Site, would off-set heavy uses on any single park or recreational facility. In addition to the parks in the immediate vicinity of the Project Site, residual off-site park usage would likely be dispersed among the 10 parks located within a two-mile radius, or even the 80 neighborhood community parks located within a five-mile radius, and three regional parks located within a 10-mile radius. Therefore, the impacts at any single park location would be small, and the Proposed Project's contribution to park use would not cause substantial degradation of existing facilities or require a new public park. Additionally, the Proposed Project's payment of applicable Quimby fees (LAMC Section 17.12) and Dwelling Unit Construction Tax (LAMC Section 21.10.3(a)(1)) could be utilized for park and recreational facility acquisition, expansion, and improvement. ***As such, Project operation would not 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. Therefore, impacts on parks and recreational facilities during Project operation would be less than significant.***

(2) Mitigation Measures

Impacts with regard to recreation and park facilities would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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?

(1) Impact Analysis

As detailed in the discussions under Thresholds a) and b), the Proposed Project would comply with regulations regarding open space and recreational facilities. In addition, although the Project would introduce a residential population that would generate a demand for parks and recreational facilities, Project residents would be anticipated to utilize the Proposed Project's on-site open space and recreational facilities, which would off-set the use of off-site park and recreational facilities. Additionally, the Proposed Project's payment of applicable Quimby fees (LAMC Section 17.12) and Dwelling Unit Construction Tax (LAMC Section 21.10.3(a)(1)) could be utilized for park and recreational facility acquisition, expansion, and improvement. Therefore, the Proposed Project would not include or require the construction or expansion of recreational facilities that would result in adverse physical effects on the environment. ***Impacts to parks and recreational facilities would be less than significant.***

(2) Mitigation Measures

Impacts upon park and recreational facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project impacts with regard to parks and recreation would be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

(1) Impact Analysis

Development of the Project, in conjunction with the 63 related projects, could result in an increase in 7,909 permanent residents living within a 1.5-mile radius in the surrounding

area.[54] Additional cumulative development would contribute to lowering the existing parkland to population ratio. However, each of the related projects that contain a residential component is expected to comply with the payment of park mitigation fees, such as Quimby fees and the Dwelling Unit Construction Tax. Related residential projects in the City would be required to comply with the City of Los Angeles Quimby and Parkland Fees to mitigate the park- and open space-related impacts of new residential development projects. Therefore, with payment of the applicable recreation fees on a project-by-project basis, along with the provision of required on-site open space for the residential projects, the cumulative park impacts related to parks and recreational facilities would be reduced to a less-than-significant level.

(2) Mitigation Measures

Cumulative impacts with regard to parks and recreation would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

[54] *See Table IV.G-6, Estimated Cumulative Population and Housing Growth, in Section IV.G, Population and Housing.*

IV. Environmental Impact Analysis

H. Public Services

5. Libraries

1. Introduction

This section addresses the Proposed Project's potential impacts upon the City of Los Angeles Public Library (LAPL) and the local libraries in the Project area. The purpose of this section is to determine whether existing public libraries serving the Project Site can accommodate the increase in residents and whether the increase in residents would result in the development or construction of new public libraries, which in turn would have the potential to generate environmental impacts. The analysis presented below is based, in part, on library facilities and capacity data information provided by the LAPL. The LAPL's written correspondence letter, dated April 22, 2019 is contained in Appendix G.5 to this Draft EIR.

2. Environmental Setting

a) Regulatory Framework

(1) City General Plan Framework

The City General Plan Framework, adopted in December 1996 and readopted in August 2001, provides general guidance regarding land use issues for the entire City and defines Citywide policies regarding land use, including infrastructure and public services. Direction regarding the provision of adequate library services and facilities to meet the needs of the City's residents are set forth in Objectives 9.20 and 9.21.

Policy 9.20.1 of Objective 9.20 recommends the development of library standards based on the library facilities' net floor area, the appropriate number of permanent collection books per resident, and service radii. Policy 9.20.2 of Objective 9.20 proposes a Citywide policy for locating non-English language permanent collections. Objective 9.21 proposes ensuring library services for current and future residents and businesses. As part of Objective 9.21, Policy 9.21.1 proposes seeking additional resources to maintain and expand library services, 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.

Chapter 10 (Implementation Plans) of the Framework Element 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 to this Element 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 (LAUSD), 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 implementation plans and policies set forth in the General Plan Framework were addressed through the 2007 LAPL Branch Facilities Plan, which is discussed further below.

(2) Wilshire Community Plan

The Wilshire Community Plan, adopted September 19, 2001, includes the following goals, objectives, and policies that are relevant to libraries:

Goal 7 Ensure that adequate library facilities are provided for the Wilshire Community.

Objective 7-1 Encourage the City's Library Department to continue to provide adequate library service to the Wilshire Community Plan Area.

Policy 7-1.1 Support construction of new libraries and rehabilitation and expansion of existing libraries.

(3) Los Angeles Public Library Branch Facilities Plan

The Los Angeles Public Library Branch Facilities Plan (Facilities Plan) was adopted by the Board of Library Commissioners in 1988 and revised in 2007. The Facilities Plan guides the construction, maintenance and organization of public branch libraries. It consists of two components – a Site Selection Guidelines that set standards for the size and features of branches based on location and the population served in each community, and a List of Projects, identifying the facility status and need of each existing branch library and identifying the need for branch libraries in communities without existing libraries. The 2007 Branch Facilities Plan includes criteria for new libraries, which recommends new size standards for the provision of LAPL facilities: 12,500 square feet of library facilities for community with less than 45,000 population, 14,500 square feet of library facilities for community with more than 45,000 population, and up to 20,000 square feet for a regional branch library. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area.

(4) Measure L

The LAPL budget ($150.7 million) is two percent of the total City budget ($6.7 billion).[55] In 2011, Measure L, the Public Library Funding Charter Amendment, was approved by over 63 percent of voters. Measure L provides funds to restore 6-day-a-week service at all 73 libraries, and eventually 7-day-a-week service at 9 libraries, purchase additional books, and increase access to the LAPL's collections, computers and programs including after-school/summer youth, student homework help, adult literacy, and job search programs.[56] Over the course of 4 years, (2011-2015), Measure L provided the LAPL with the money it needed to pay all these costs and restore library services.

(5) Los Angeles Public Library Strategic Plan 2015-2020

As a response to Measure L, the Los Angeles Public Library Strategic Plan 2015-2020 (Strategic Plan) was developed to identify specific goals and objectives that focus on community development and program expansion in an effort to increase the number of people who use the library services, to increase the number of library cardholders and actively promote the robustly market programs and services to increase residents' overall engagement with the libraries, to increase participation from students and patrons for certain collections and online resources, and to increase the amount of collections and

[55] *Los Angeles Public Library, Measure L Fact Sheet, accessed April 2019.*
[56] *Ibid.*

materials available both in the libraries and online.[57] The Strategic Plan does not include goals or objectives regarding LAPL's construction of new facilities or expansion of existing facilities. Such goals and objectives are contained in the Branch Facilities Plan, which continues to guide the construction, maintenance, and organization of LAPL's library facilities.

b) Existing Conditions

(1) Library Facilities

Within the City of Los Angeles, the LAPL provides library services at the Richard J. Riordan Central Library, eight regional branch libraries, and 64 neighborhood branch libraries, as well as through internet-based resources. Approximately 6.5 million books and other materials, 2,300 public computers, Adult Literacy Centers, online homework help, online job search guide and resources, and programs for children, teens, and adults are all provided in the LAPL.[58]

(2) Public Libraries Serving the Project Area

Library facilities within two miles of a Project Site are generally considered to be within the service area of a project.[59] The LAPL branch libraries within the Project's service area are shown in Table IV.H-17, Library Facilities Serving the Project Area, below. The locations of these facilities in relation to the Project Site are depicted in Figure IV.H-5. Public Library Location Map.

Table IV.H-17
Library Facilities Serving the Project Area

Library Branch	Approx. Distance to Project Site (miles)	*Facility Size (square feet)*	Collection Size	Existing Service Population	Staff/ Volunteers
1. Fairfax Branch Library 161 S. Gardner Street	0.6	12,500 sf	50,218	36,336	11 / 77
2. John C. Fremont Branch Library 6121 Melrose Avenue	1.7	7,361 sf	40,452	18,418	8.5 / 14
3. Memorial Branch Library 4625 W. Olympic Boulevard	1.8	10,578 sf	37,352	45,615	9 / 32

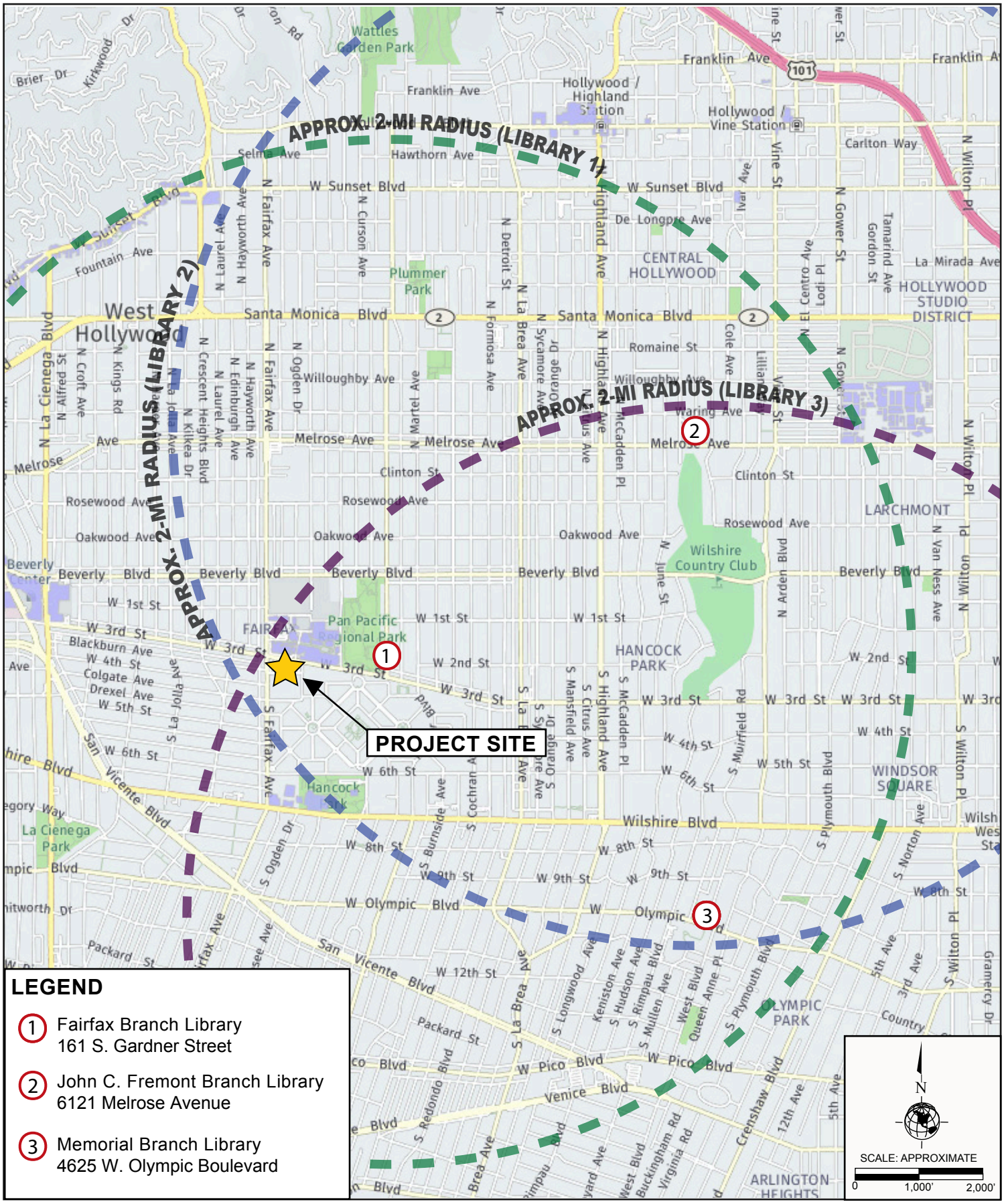
Notes:
[a] All branches offer computer workstations, free public Wi-Fi, and wireless and mobile printing.
Source: City of Los Angeles Public Library, April 22, 2019. (See Appendix G.5 to this Draft EIR)

[57] *Los Angeles Public Library, Los Angeles Public Library Strategic Plan 2015-2020, June 2015.*
[58] *Los Angeles Public Library, Los Angeles Public Library Strategic Plan 2015-2020, June 2015.*
[59] *City of Los Angeles, L.A. CEQA Thresholds Guide (2006), Section K.5, at page K.5-2.*

The Fairfax Branch Library is the nearest library facility serving the Project Site. It is located at 161 S. Gardner Street, and is approximately 0.6 miles from the Project Site. The Fairfax Branch Library is approximately 12,500 square feet in size and has a collection size of 50,218 materials. The existing service population of the Fairfax Branch Library is 36,336 persons. It is staffed by 11 employees and has approximately 77 volunteers.

The John C. Fremont Branch Library is the second closest library facility serving the Project Site. It is located at 6121 Melrose Avenue, and is approximately 1.7 miles from the Project Site. This Branch Library is approximately 7,361 square feet in size and has a collection size of 40,452 materials. The existing service population of the John C. Fremont Branch Library is 18,418 persons. It is staffed by 8.5 employees and has approximately 14 volunteers.

The Memorial Branch Library is located at 4625 W. Olympic Boulevard and is approximately 1.8 miles from the Project Site. The Memorial Branch Library is approximately 10,578 square feet in size and has a collection size of 37,352 materials. The existing service population of the Memorial Branch Library is 45,615 persons. It is staffed by 9 employees and has approximately 32 volunteers. As noted in LAPL's correspondence dated April 22, 2019 (see Appendix G.5 to this Draft EIR), the LAPL does not currently have plans to expand any of the libraries serving the Project Site area, nor does it currently have plans to construct new libraries in the Project Site vicinity.



Source: Yahoo Maps, 2018; Parker Environmental Consultants.

Figure IV.H-5
Public Library Location Map

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 libraries if it would:

Threshold a) Result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, or need for new or physically altered government 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.

The L.A. CEQA Thresholds Guide (Thresholds Guide) identifies the following criteria to evaluate libraries:

a) The net population increase resulting from the Project;

b) 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, or addition) and the project's proportional contribution to the demand; and

c) Whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct support to the Los Angeles Public Library).

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.

b) Methodology

The Proposed Project's environmental impacts upon library services are determined based on the population of the service areas for the existing libraries serving the Project area and the ability of the libraries serving the Project area to continue to serve the Project area population based on the anticipated number of library patrons and residents that the Proposed Project is anticipated to generate upon buildout, and whether the added demand would require the construction of new facilities to meet the Project's added demand.

c) Project Design Features

No specific project design features are proposed with regard to libraries.

d) Analysis of Project Impacts

Threshold a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or 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?

(1) Impact Analysis

(a) Construction

The Proposed Project is anticipated to increase the demand for skilled construction-related jobs during its construction, and therefore would increase the presence of temporary employees on-site and in the immediate surrounding area. These persons may utilize surrounding neighborhood library facilities. However, any increases in the use of library facilities caused by the construction workers are expected to be minimal, since permanent residents usually utilize local libraries. Therefore, the potential for construction workers to increase demand on local libraries is unlikely, and impacts associated with library demands due to temporary construction jobs would be less than significant.

(b) Operation

Development of the Proposed Project would include the construction of 331 residential dwelling units and 83,994 square feet of new commercial space. As discussed in Section IV.G, Population and Housing, it is estimated that the development of the Proposed Project would result in an increase of up to 801 new residents to the Wilshire Community Plan area. This increase in resident population would create an additional potential demand on the three local library facilities within a 2-mile radius.

As noted in the LAPL's response letter to the NOP, the closest library facility serving the Project Site is the Fairfax Branch Library. The Fairfax Branch Library is approximately 12,500 square feet in size and has an existing service population of 36,336 persons. Based on the LAPL's criteria for citing new facilities, a 12,500 square foot facility has a standard service population of less than 45,000 persons. With the addition of the Proposed Project's 801 new residents, the Fairfax Branch Library's service population would be increased to 37,137 persons, which is within the standard service population

criteria for library facilities. When compared to the two other libraries within a two-mile radius, the John C. Fremont Branch Library and the Memorial Branch Library, the Fairfax Branch Library is larger in size and provides a larger collection. Therefore, the Proposed Project's residents' use of these two libraries would be reduced since these libraries are located farther than the Fairfax Branch Library and provide the same services. Additionally, LAPL has been increasing their online services, including a variety of e-books, study materials, and support, available to users through the LAPL online resources.[60] As such, the development of the Proposed Project would not induce the LAPL to build a new facility or expand the Fairfax Branch Library to accommodate the additional demands of the Proposed Project. ***Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered library 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. Impacts upon library facilities would therefore be less than significant.***

(2) Mitigation Measures

Project impacts upon library facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

(1) Impact Analysis

Development of the Proposed Project, in conjunction with the 63 related projects that occur within the City of Los Angeles and City of West Hollywood, would result in an increase in permanent residents residing in the Project area, which would likely generate additional demands upon library services. Of the 63 related projects that occur within the City of Los Angeles, 51 propose residential dwelling units that would directly increase the population by approximately 5,924 residents.[61] When combined with the Proposed Project's 801 new residents, the Proposed Project and related projects would add a total of 6,725 new residents to the local libraries within a 1.5-mile radius. Pursuant to the library

[60] *Los Angeles Public Library, Strategic Plan 2015-2020, page 12, June 2015.*
[61] *See Table IV.H-7, Estimated Cumulative LAPD Service Population, in Section IV.H.2., Police Protection above.*

sizing standards recommended in the 2007 Branch Facilities Plan, the service population standard for 12,500 square foot facilities is a population less than 45,000. As shown in Table IV.H-18, Library Service Population With Cumulative Growth, the cumulative service population of the Proposed Project, combined with the cumulative population and existing service population would be below 45,000 persons for the Fairfax Branch Library and the John C. Fremont branch Library. However, the cumulative service population for the Memorial Branch Library would continue to exceed the recommended facility standard for this library.[62] As noted above, there are currently no plans to expand these facilities or construct new library facilities in the area.

Table IV.H-18
Library Service Population With Cumulative Growth

Library Branch	*Existing Facility Size (square feet)*	*Service Population Standard (residents)*	Existing Service Population (residents)	Future Service Population With Cumulative Growth	Meets Recommended Size Standard With Cumulative Growth?
4. Fairfax Branch Library	12,500 sf	>45,000	36,336	43,061	Yes
5. John C. Fremont Branch Library	7,361 sf	>45,000	18,418	25,143	Yes
6. Memorial Branch Library	10,578 sf	>45,000	45,615	52,340	No

Source: City of Los Angeles Public Library, Los Angeles Public Library Response Letter, dated April 22, 2019. (See Appendix G.5 to this Draft EIR)

Further, the above analysis is conservative since it assumes that the entire cumulative population would use just one library, which is not a likely scenario since library usage would more likely be distributed among all three libraries identified by LAPL, as well as any other libraries that would be located closer to the related projects that are further from the Project Site. The above analysis is also conservative because it does not take into account related projects that may not be built, or that may be reduced in size, or the demolition of any existing housing that may be required to accommodate the new development. The majority of the related projects would, similar to the Proposed Project, have several library options to choose from even with the increase in service population. Similar to the Project, each related project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, transient occupancy tax, etc.) that could be applied toward the provision of enhancing library services in the Community Plan area, as deemed appropriate. These revenues to the City's General Fund would help offset the increase in demand for library services as a result of the Proposed 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

[62] *It should be noted that the Memorial Branch Library has an existing service population of 45,616 which exceeds the recommended size standard under existing conditions.*

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 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. The LAPL Strategic Plan sets goals and objectives to increase participation from students and patrons for certain collections and online resources, as well as to increase the amount of collections and materials available both in the libraries and online, and as stated in the Strategic Plan, LAPL has been increasing their online services, including a variety of e-books, study materials, and support, available to users through the LAPL online resources. The availability of such resources reduces the demand for physical library space. ***Therefore, based on the above, the Proposed Project's contribution to the cumulative impacts on libraries would not be cumulatively considerable, and impacts would be less than significant.***

(2) Mitigation Measures

Cumulative impacts upon library facilities were determined to be less than significant without mitigation. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Impacts were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.