

IV. Environmental Impact Analysis

F.3 Public Services—Libraries

1. Introduction

This section of the Draft EIR analyzes the potential impacts of the Project with regard to the facilities and services administered by the Los Angeles Public Library (LAPL). The analysis describes existing LAPL facilities in the vicinity of the Project Site and determines whether existing facilities are sufficient to accommodate the anticipated library demand of the Project. The analysis is based in part on information provided by the LAPL in a letter dated August 30, 2019, which is included in Appendix F of this Draft EIR.

2. Environmental Setting

a. Regulatory Framework

(1) Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (General Plan Framework) establishes a Citywide context to guide long-term planning at the City and community levels. Adopted in December 1996 and readopted in August 2001, the General Plan Framework provides general guidance regarding land use issues that include direction on infrastructure and public services.

Chapter 9 (Infrastructure and Public Services) of the General Plan Framework contains objectives and policies that address library facilities. Specifically, Objectives 9.20 and 9.21 outline policies for the provision of adequate library services and facilities to meet the needs of the City's residents. 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 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 General Plan Framework Element states that the LAPL is charged with responsibility of updating the Library Master Plan to provide sufficient capacity to correct existing deficiencies as well as meet the needs of future population. Updates of the plan should:

- a. Identify improvements including, but not limited to, new library facilities, alternatives to “stand-alone facilities” (such as mobile collections and “substations” at transit stations or in mixed-use structures) which encourage greater distribution of library facilities; new methods for acquiring books and equipment; ways to connect library telecommunications services with other City agencies as well as local college and university systems; and ways to identify regional libraries that are appropriate for non-English language collections, consistent with neighborhood needs.
- b. Adopt strategies that enhance the viability of joint development and joint-use opportunities with large commercial projects and the Los Angeles Unified School District (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 Element have been addressed through the Los Angeles Library Branch Facilities Plan and the 1989 and 1998 Library Bond Programs, which are described below.

(2) Los Angeles Public Library Branch Facilities Plan

The Los Angeles Public Library Branch Facilities Plan (Branch Facilities Plan), first adopted in 1988 and revised in 2007, guides the construction, maintenance, and organization of public branch libraries and establishes specific standards in defining geographic service areas and the size of branch facilities. The Branch Facilities Plan is composed of two elements: the Criteria for New Libraries and the Proposed Project List.¹ The Criteria for New Libraries sets standards for the size and features of new library branches based on the population served in each community, while the Proposed Project

¹ *The Criteria for New Libraries component of the 2007 Branch Facilities Plan was formerly referred to as the Site Selection Guidelines in the 1988 Branch New Facilities Plan.*

List identifies 19 future library projects including renovations or replacements of 11 existing branch facilities and construction of eight new branch facilities.²

The Branch Facilities Plan was initially implemented through the 1989 and 1998 Bond Programs. The 1989 Bond Program, or Phase I, provided \$53.4 million for 26 library projects.³ It was supplemented with additional funding of \$54.6 million from the Community Development Block Grant award of federal funds, the California State Library Proposition 85, and Friends of the Library groups, thereby facilitating the development of an additional three projects.⁴ Similarly, the 1998 Bond Program, or Phase II, provided \$178.3 million for 32 projects, which was supplemented with an additional \$48 million from managed savings, Friends of the Library contributions, and a California State Library Proposition 14 grant.⁵ The supplementary funding facilitated the construction of an additional four projects.

With completion of the library projects identified in the 1988 Branch Facilities Plan, the LAPL has planned for the future by analyzing current and future library services and facilities needs, as well as population growth projections to the year 2030. As a result of these efforts, a revised Branch Facilities Plan was reviewed and approved by the Board of Library Commissioners in 2007 (2007 Branch Facilities Plan). The 2007 Branch Facilities Plan is now the base document for future development of LAPL facilities. As such, it provides guidance on the preparation of cost estimates for property acquisition, design and construction of proposed library projects, and analyses of options for obtaining funding to build new libraries. As shown in Table IV.F.3-1 on page IV.F.3-4, the Criteria for New Libraries component of the 2007 Branch Facilities Plan recommends facility size standards for new libraries based on its service population. While the 2007 Branch Facilities Plan provides general guidance on library facility improvements, there are no current plans for new development or renovation of library facilities.⁶ Based on a 2017 Request for Proposal from LAPL, the LAPL is anticipated to prepare an updated Library Facilities Master Plan to guide the LAPL for the next 10 to 20 years.⁷ However, LAPL has not yet released an anticipated completion date for the updated master plan.⁸

² *Los Angeles Public Library Strategic Plan 2007–2010, Appendix VI: Branch Facilities Plan, Draft Revision.*

³ *Passed by City voters through Proposition 1 in 1989.*

⁴ *Los Angeles Public Library Strategic Plan 2007–2010, Appendix VI: Branch Facilities Plan, Draft Revision.*

⁵ *Passed by City voters through Proposition DD in 1998.*

⁶ *Los Angeles Public Library Strategic Plan 2007–2010, Appendix VI: Branch Facilities Plan, Draft Revision.*

⁷ *City of Los Angeles, Los Angeles Business Assistance Virtual Network, RFP No. 44-017—Library Facilities Master Planning Consultant(s) RFP, www.labavn.org/index.cfm?fuseaction=contract.opportunity_view&recordid=30027, accessed September 21, 2020.*

⁸ *Correspondence from Eloisa Sarao, Director, Facilities and Event Management, Los Angeles Public Library, dated November 23, 2020.*

**Table IV.F.3-1
LAPL Branch Building Size Standards**

Population Served	Size of Facility^a
Below 45,000	12,500 sf
Above 45,000	14,500 sf
Regional Branch	Up to 20,000 sf
<p><i>sf = square feet</i></p> <p>^a <i>For communities with populations above 90,000, the LAPL suggests consideration of adding a second branch to that area.</i></p> <p><i>Source: Written communication from the Los Angeles Public Library, August 30, 2019. See Appendix F of this Draft EIR.</i></p>	

(3) Los Angeles Public Library Strategic Plan 2015–2020⁹

The Los Angeles Public Library Strategic Plan 2015–2020 (Strategic Plan) sets forth LAPL's goals and objectives regarding library services. The goals and objectives discussed in the Strategic Plan focus on community development and program expansion in an effort to increase the number of people who use the library services, increase the number of library card holders, and increase residents' overall engagement with the library. 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. The prospective Library Facilities Master Plan (described above) would be anticipated to be aligned with the LAPL 2015–2020 Strategic Plan.¹⁰

(4) Central City Community Plan

As discussed in Section IV.D, Land Use of this Draft EIR, the Project Site is located within the Central City Community Plan area. The Central City Community Plan, last updated in 2003, includes the following objective and policy that are relevant to public libraries:

⁹ *Los Angeles Public Library Strategic Plan 2015–2020, June 2015.*

¹⁰ *City of Los Angeles, Los Angeles Business Assistance Virtual Network, RFP No. 44-017—Library Facilities Master Planning Consultant(s) RFP, www.labavn.org/index.cfm?fuseaction=contract.opportunity_view&recordid=30027, accessed September 21, 2020.*

- Objective 8-1: To assist the City Library Department in providing adequate library service which responds to the needs of the community.
 - Policy 8-1.1: Encourage flexibility in siting libraries in mixed use projects, pedestrian oriented areas, transit oriented districts, and similarly accessible facilities.

b. Existing Conditions

(1) Regional Facilities

The LAPL provides library services to the City through the Richard J. Riordan Central Library (Central Library), eight regional branch libraries, and 72 community branch libraries, as well as through Internet-based resources.¹¹ Administratively, the LAPL is divided into six geographic regions, which include the Central Southern, Northeast, East Valley, West Valley, Hollywood, and Western regions.¹² The Project Site is located in the LAPL's Northeast region. The LAPL offers more than 6.5 million items, including books, magazines, photos, movies, e-books, podcasts, audiobooks, and streaming video; over 1,000 online courses; and more than 18,000 public programs.¹³ During the 2017–2018 fiscal year, the most recent year that data is available, the LAPL received 11.2 million visits to its libraries, 15.4 million web visits, and loaned 16.1 million items.¹⁴

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

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

¹¹ *Los Angeles Public Library, Library Directory.*

¹² *Los Angeles Public Library, Library Directory.*

¹³ *Los Angeles Public Library Strategic Plan 2015–2020, June 2015.*

¹⁴ *Los Angeles Public Library, By The Numbers (FY 2017–2018), updated 10-02-2018.*

enhance the level and diversity of resources available to library users, while reducing duplication of effort.¹⁵

(2) Local Facilities

Based on information provided by the LAPL, the Project Site is located within the service areas of several library facilities within a two-mile radius, which is the distance that is generally considered to encompass a library service area.¹⁶ These libraries include the Central Library, Little Tokyo Branch Library, Pico Union Branch Library, Chinatown Branch Library, Echo Park Branch Library, and Felipe de Neve Branch Library. Figure IV.F.3-1 on page IV.F.3-7 identifies the locations of the existing public library facilities serving the Project Site.

The Central Library serves as the headquarters for the LAPL at 630 West 5th Street, approximately 0.3 mile northwest of the Project Site. The Central Library is approximately 538,000 square feet in size and carries 2.6 million volumes in collection with a staff of 390 full-time employees. Based on 2010 Census data, the service population of the Central Library in the City of Los Angeles is approximately 3,792,662 persons. The Central Library is not only a resource for the local population, but it is also a destination for regional, domestic, and international patrons. As such, the 2007 Branch Facilities Plan's recommended building size standards are not used to evaluate the Central Library's population service levels.

The Little Tokyo Branch Library is located at 203 South Los Angeles Street and is approximately 0.84 mile northeast of the Project Site. The Little Tokyo Branch Library is approximately 12,500 square feet and carries 66,634 volumes in collection with a staff of 10 full-time employees. According to the LAPL, based on the *Los Angeles Times*' Mapping LA database and branch library community boundaries, the service population of the Little Tokyo Branch Library is approximately 45,796 persons.¹⁷ As a result, the Little Tokyo Branch Library currently does not meet the recommendations set forth in the 2007 Branch Facilities Plan (i.e., 14,500 square feet for a service population greater than 45,000 persons).

The Pico Union Branch Library is located at 1030 South Alvarado Street and is approximately 1.24 miles northwest of the Project Site. The Pico Union Branch Library is

¹⁵ Southern California Library Cooperative, SCLC, <http://socallibraries.org/>, accessed September 11, 2019.

¹⁶ As set forth in the L.A. CEQA Thresholds Guide, Section K.5, page K.5-2, the service area of a library is a two-mile radius from the library.

¹⁷ Written communication from the Los Angeles Public Library, August 30, 2019. See Appendix F of this Draft EIR.

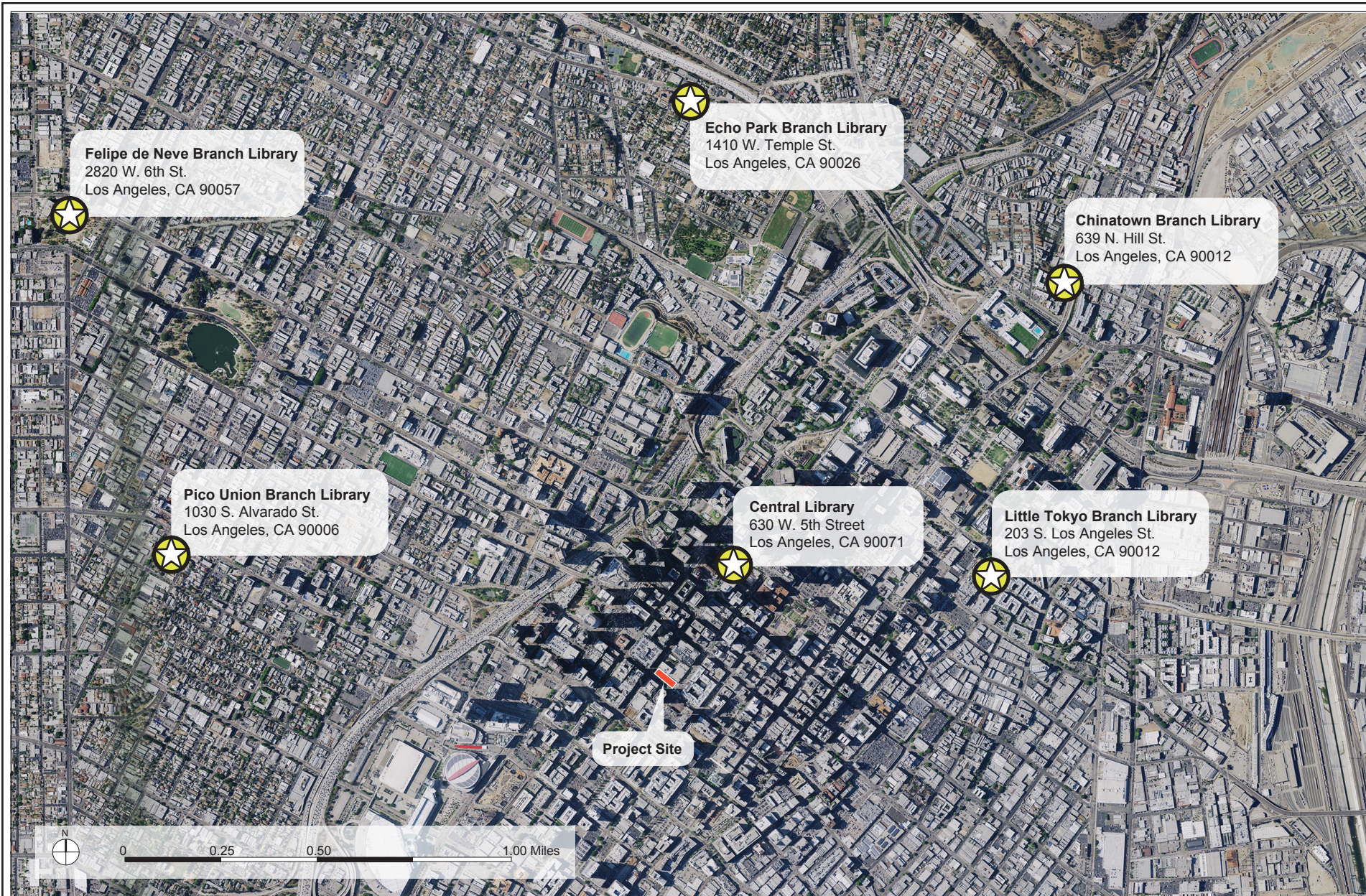


Figure IV.F.3-1
Libraries Serving the Project Vicinity

approximately 12,500 square feet in size and carries 46,562 volumes in collection with a staff of 10.5 full-time employees. According to LAPL, based on the *Los Angeles Times'* Mapping LA database and branch library community boundaries, the service population of the Pico Union Branch Library is approximately 41,457 persons.¹⁸ As such, the Pico Union Branch Library currently meets the building size recommendations set forth in the 2007 Branch Facilities Plan (i.e., 12,500 square feet for a service population less than 45,000 persons).

The Chinatown Branch Library is located at 639 North Hill Street and is approximately 1.38 miles northeast of the Project Site. The Chinatown Branch Library is approximately 14,500 square feet in size and carries 74,709 volumes in collection with a staff of 13.5 full-time employees. According to LAPL, based on the *Los Angeles Times'* Mapping LA database and branch library community boundaries, the service population of the Chinatown Branch Library is approximately 11,225 persons.¹⁹ As such, the Chinatown Branch Library currently meets the recommendations set forth in the 2007 Branch Facilities Plan (i.e., 12,500 square feet for a service population below 45,000 persons).

The Echo Park Branch Library is located at 1410 West Temple Street, approximately 1.42 miles north of the Project Site. The Echo Park Branch Library is approximately 17,543 square feet in size and carries 43,689 volumes in collection with a staff of 9.5 full-time employees. According to the LAPL, based on the *Los Angeles Times'* Mapping LA database and branch library community boundaries, the service population of the Echo Park Branch Library is approximately 52,842 persons. As such, the Echo Park Branch Library currently meets the recommendations set forth in the 2007 Branch Facilities Plan (i.e., 14,500 square feet for a service population greater than 45,000 persons).

The Felipe de Neve Branch Library is located at 2820 West 6th Street and is approximately 1.84 miles northwest of the Project Site. The Felipe de Neve Branch Library is approximately 9,273 square feet in size and carries 35,424 volumes in collection with a staff of nine full-time employees. According to LAPL, based on the *Los Angeles Times'* Mapping LA database and branch library community boundaries, the service population of the Felipe de Neve Branch Library is approximately 110,861 persons.²⁰ As such, the Felipe de Neve Branch Library does not currently meet the recommendations set forth in the 2007 Branch Facilities Plan (i.e., 14,500 square feet for a service population greater

¹⁸ Written communication from the Los Angeles Public Library, August 30, 2019. See Appendix F of this Draft EIR.

¹⁹ Written communication from the Los Angeles Public Library, August 30, 2019. See Appendix F of this Draft EIR.

²⁰ Written communication from the Los Angeles Public Library, August 30, 2019. See Appendix F of this Draft EIR.

than 45,000 persons). In addition, as suggested by the LAPL for communities with populations above 90,000, the addition of a second branch library should be considered for the Felipe de Neve Branch Library area.

As stated by the LAPL, there are currently no planned or funded improvements to add capacity through expansion or development of new libraries in the vicinity of the Project Site.²¹

The hours of operation of the Central Library are Monday through Thursday from 10:00 A.M. to 8:00 P.M., Friday and Saturday from 9:30 A.M. to 5:30 P.M., and Sunday from 1:00 P.M. to 5:00 P.M. The hours of operation for the branch libraries serving the Project Site are Monday and Wednesday from 10:00 A.M. to 8:00 P.M., Tuesday and Thursday from 12:00 P.M. to 8:00 P.M., Friday and Saturday from 9:30 A.M. to 5:30 P.M., and closed on Sunday.²²

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 (i.e., libraries), 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 libraries.

In assessing impacts related to library services in this section, the City will use Appendix G as the thresholds of significance. The factors and considerations identified below from the City's *L.A. CEQA Thresholds Guide* are used where applicable and relevant to assist in analyzing the Appendix G thresholds.

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

²¹ Written communication from the Los Angeles Public Library, August 30, 2019. See Appendix F of this Draft EIR.

²² Written communication from the Los Angeles Public Library, August 30, 2019. See Appendix F of this Draft EIR.

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

b. Methodology

The methodology used to evaluate potential library impacts includes the following:

- (1) identifying libraries within two miles of the Project Site that would serve the Project;
- (2) projecting the future service population for the library that would serve the Project;
- (3) comparing the future service population to the service population of the LAPL building size standards as set forth in the 2007 Branch Facilities Plan Criteria for New Libraries; and
- (4) determining whether the Project's contribution to the future service population would cause the library to operate beyond its service capacity.

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 government facilities (i.e., libraries), 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 libraries?

(1) Impact Analysis

(a) Construction

Construction of the Project would result in a temporary increase of construction workers on the Project Site. 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 Project construction. Specifically, construction workers typically work in a specific trade that would work on a given project for a short period of time before moving to the next project.

Therefore, Project-related construction workers would not result in a notable increase in the residential population within the service area of the Central Library, Little Tokyo Branch Library, Pico Union Branch Library, Chinatown Branch Library, Echo Park Branch Library, and Felipe de Neve Branch Library. In addition, Project-related construction workers would not result in a notable increase in an overall corresponding demand for library services in the vicinity of the Project Site because it is unlikely that construction workers would visit libraries in the vicinity of the Project Site on their way to/from work or during their lunch hours. Instead, construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible.

Based on the above, construction of the Project would not exceed the capacity of local libraries to adequately serve the existing residential population based on target service populations or as defined by the LAPL, and would not substantially increase the demand for library services for which current demand exceeds the ability of the facility to adequately serve the population. **Therefore, Project construction would not result in the need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts. As such, impacts related to library facilities during construction would be less than significant.**

(b) Operation

As described above, based on the information provided by the LAPL, the Project Site is located within the service areas of the Central Library, Little Tokyo Branch Library, Pico Union Branch Library, Chinatown Branch Library, Echo Park Branch Library, and Felipe de Neve Branch Library. These six libraries are located within a 2-mile radius of the Project Site, the distance that is generally considered to comprise the service area of a library.²³

As described in Section II, Project Description, of this Draft EIR, the Project Site is currently comprised of a surface parking lot and a parking structure. As such, under existing conditions, the Project Site does not include a residential population that would utilize the service area libraries identified above. The Project would develop 580 residential units and up to 7,499 square feet of ground floor commercial/retail/restaurant space. According to American Community Survey data, the estimated household size for the City

²³ L.A. CEQA Thresholds Guide, Section K.5, p. K.5-2.

of Los Angeles is 2.41 persons per multi-family unit.^{24,25} Applying this generation factor, the Project would generate up to 1,398 residents and would increase the Project Site's demand for library services when compared to existing conditions.

According to the LAPL, based on 2010 Census data, the Central Library's service population is 3,792,662 persons. With the addition of the Project's estimated 1,398 new residents, the service population of the Central Library would increase to 3,794,060 persons. As previously noted, the Central Library is not only a resource for the local population, but it is also a destination for regional, domestic, and international patrons. As such, the 2007 Branch Facilities Plan's recommended building size standards are not used to evaluate the Central Library's population service levels.

Under existing conditions, the Little Tokyo Branch Library does not meet the recommended building size standard of 14,500 square feet for a service population greater than 45,000 persons. With the addition of the Project's estimated 1,398 residents, the service population for the 12,500-square-foot Little Tokyo Branch Library would increase from 45,796 to 47,194 persons. Therefore, the Little Tokyo Branch Library would continue its operations without meeting the recommended building size standards. As stated above, there are currently no plans to expand this library or develop additional facilities to serve the area.

The Pico Union Branch Library currently meets the recommended building size standard of 12,500 square feet for a service population below 45,000 persons. With the addition of the Project's estimated 1,398 residents, the service population for the 12,500-square-foot Pico Union Branch Library would increase from 41,457 to 42,855 persons. As such, the Pico Union Branch Library would continue to meet the recommended building size standards with the addition of the Project.

As provided above, the Chinatown Branch Library currently meets the recommended building size standard of 12,500 square feet for a service population below 45,000 persons. With the addition of the Project's estimated 1,398 residents, the service population for the 14,500-square-foot Chinatown Branch Library would increase from 11,225 to 12,623 persons. As such, the Chinatown Branch Library would continue to meet the recommended building size standards with the addition of the Project.

²⁴ Based on a rate of 2.41 persons per multi-family unit based on the 2018 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020.

²⁵ As a note, the Initial Study for the 8th, Grand and Hope Project (Appendix A of this Draft EIR) applied an estimated rate of 2.43 persons per multi-family unit, which was the available rate provided by the City of Los Angeles at the time of publication of the Initial Study. This Draft EIR now utilizes the updated rate of 2.41 persons per multi-family unit provided by the City of Los Angeles.

The Echo Park Branch Library currently meets the recommended building size standard of 14,500 square feet for a service population greater than 45,000 persons. With the addition of the Project's estimated 1,398 residents, the service population for the 17,543-square-foot Echo Park Branch Library would increase from 52,842 to 54,240 persons. As such, the Echo Park Branch Library would continue to meet the recommended building size standards with the addition of the Project.

Under existing conditions, the Felipe de Neve Branch Library does not meet the recommended building size standard of 14,500 square feet for a service population greater than 45,000 persons. In addition, as suggested by the LAPL for communities with populations above 90,000, the addition of a second branch library should be considered for the Felipe de Neve Branch Library area. With the addition of the Project's estimated 1,398 residents, the service population for the 9,273-square-foot Felipe de Neve Branch Library would increase from 110,861 to 112,259 persons. As such, the Felipe de Neve Branch Library would continue its operations without meeting the recommended building size standards. As stated above, there are currently no plans to expand this library or develop additional facilities to serve the area.

With regard to anticipated library service at Project buildout, the Southern California Association of Governments (SCAG) projects population growth for the City of Los Angeles Subregion. According to the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS), the City population is projected to grow by a rate of approximately 4.31 percent between 2019 (the Project's baseline year) and 2025 (the Project's buildout year).²⁶ As shown in Table IV.F.3-2 on page IV.F.3-14, in applying this growth rate to the identified libraries, the estimated service populations in 2025 would be approximately 3,956,126 persons for the Central Library; 47,770 persons for the Little Tokyo Branch Library; and 43,244 persons for the Pico Union Branch Library; 11,709 persons for the Chinatown Branch Library; 55,120 persons for the Echo Park Branch Library; and 115,640 persons for the Felipe de Neve Branch Library.

Thus, with the addition of the Project's estimated 1,398 residents, the service population in 2025 for the 538,000-square-foot Central Library would be approximately 3,957,524 persons. As the LAPL headquarters, Central Library is not only a resource for

²⁶ According to SCAG's 2020–2045 RTP/SCS, the forecasted populations for the City of Los Angeles are approximately: 4,020,438 persons in 2019 and 4,193,714 persons in 2025. By interpolation, the 2019 value is calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to 2016: $[(4,771,300 - 3,933,800) \div 29] \times 3 + 3,933,800 = 4,020,438$. The 2025 value is calculated using SCAG's 2016 and 2045 values to find the average increase between years and then applying that annual increase to 2025: $[(4,771,300 - 3,933,800) \div 29] \times 9 + 3,933,800 = 4,193,714$. Therefore, the rate of population change was calculated to be approximately 4.31 percent.

**Table IV.F.3-2
Future Library Service Population With Project**

Library^a	2019 Service Population^a	2025 Service Population^b	2025 Service Population Plus Project	Meets Recommended Size Standards in 2025 With Project?^c
Central Library 538,000 square feet	3,792,662	3,956,126	3,957,524	— ^d
Little Tokyo Branch Library 12,500 square feet	45,796	47,770	49,168	No ^e
Pico Union Branch Library 12,500 square feet	41,457	43,244	44,642	Yes
Chinatown Branch Library 14,500 square feet	11,225	11,709	13,107	Yes
Echo Park Branch Library 17,543 square feet	52,842	55,120	56,518	Yes
Felipe de Neve Branch Library 9,273 square feet	110,861	115,640	117,038	No ^e
<p>^a Based on written communication from the Los Angeles Public Library, August 30, 2019. See Appendix F of this Draft EIR.</p> <p>^b According to SCAG's 2020–2045 RTP/SCS, the population growth rate between 2019 and 2025 was calculated to be approximately 4.31 percent. According to SCAG's 2016–2040 RTP/SCS, the population growth rate between 2019 and 2025 was calculated to be approximately 4.06 percent. Therefore, to provide a conservative analysis, the higher growth rate from the 2020–2045 RTP/SCS is considered herein.</p> <p>^c Refer to Table IV.F.3-1 on page IV.F.3-4 for LAPL Branch Building Size Standards.</p> <p>^d The 2007 Branch Facilities Plan's recommended building size standards are not used to evaluate Central Library's population service levels.</p> <p>^e Even without the addition of the Project's service population in 2025, this library would still not meet the LAPL's recommended building size standards.</p> <p>Source: Eyestone Environmental, 2020.</p>				

the local population, but it is also a destination for regional, domestic, and international patrons. As such, the 2007 Branch Facilities Plan's recommended building size standards are not used to evaluate Central Library's population service levels.

Furthermore, with the addition of the Project's estimated 1,398 residents, the estimated service populations in 2025 would be 44,642 persons for the 12,500-square-foot Pico Union Branch Library; 13,107 persons for the 14,500-square-foot Chinatown Branch Library; and 56,518 persons for the 17,543-square-foot Echo Park Branch Library. Therefore, both Pico Union Branch Library and Chinatown Branch Library would continue to meet the recommended building size standard of 12,500 square feet for a service population below 45,000 persons, and Echo Park Branch Library would continue to meet

the recommended building size standard of 14,500 square feet for a service population greater than 45,000 persons.

As for Little Tokyo Branch Library and Felipe de Neve Branch Library, recommended building size standards would continue to be unmet under future conditions. Specifically, with the addition of the Project's estimated 1,398 residents, the 12,500-square-foot Little Tokyo Branch Library would have an estimated service population of 49,168 persons, and the 9,273-square-foot Felipe de Neve Branch Library would have an estimated service population of 116,760 persons. As detailed above, both Little Tokyo Branch Library and Felipe de Neve Branch Library do not meet the recommended building size standards under existing conditions. Moreover, based on LAPL's suggestions for communities with populations above 90,000, the addition of a second branch library should be considered for the Felipe de Neve Branch Library area. Therefore, with or without the Project under future conditions, both libraries would continue to operate without meeting the recommended building size standard of 14,500 square feet for a service population greater than 45,000 persons.

It is noted that the estimates provided herein are conservative in that the totality of the Project's estimated residential population is allocated to each branch library serving the Project Site. A more likely operational characteristic of the Project would be that only a portion of the residential population generated by the Project would actually make use of library services given the availability of internet-based research and library services, including those offered by the LAPL. Additionally, a portion of the residential population generated by the Project that would visit library facilities would likely be dispersed among the various branch libraries serving the Project Site, and it is not likely that all residents would visit the same library. As discussed further below, the Project would also generate revenues to the City's General Fund, a portion of which the City could apply to library facilities.

As discussed above, the *L.A. CEQA Thresholds Guide* considers whether a project includes features that would reduce the demand for library services. The Project's residential units would be equipped to receive individual internet service, which provides information and research capabilities that studies have shown to reduce demand at physical library locations.^{27,28} Furthermore, the Project would generate revenues to the City's General Fund (in the form of property taxes, sales tax, and business tax, etc.) that could be applied toward the provision of new library facilities and related staffing for any

²⁷ Denise A. Troll, *How and Why Libraries are Changing: What We Know and What We Need to Know*, Carnegie Mellon University, 2002.

²⁸ Carol Tenopir, "Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies," 2003.

one of the libraries serving the Project Site and vicinity, as deemed appropriate.²⁹ The Project's revenue to the General Fund would help offset the Project-related increase in demand for library services.

The Project's 7,499 square feet of commercial/retail/restaurant uses would generate approximately 30 employees.³⁰ Employment opportunities generated by these uses would include a range of full-time and part-time positions anticipated to be filled in part by persons who already reside in the vicinity of the workplace and who may already generate a demand for libraries in the vicinity of the Project Site. Additionally, employees at the Project Site would have internet access, which provides information and research capabilities and reduces the demand at physical library locations. Moreover, Project employees that do not already reside in the vicinity of the Project Site would be more likely to use libraries near their homes than near their place of work. As such, any new direct or indirect demand for library services generated by Project employees is expected to be negligible.

Based on the above, and pursuant to the library sizing standards recommended in the 2007 Branch Facilities Plan, operation of the Project would not create any new exceedance of the capacity of local libraries to adequately serve the residential population based on target service populations or as defined by the LAPL, which would result in the need for a new or altered facilities, or substantially increase the demand for library services for which current and future demand exceeds the ability of the facility to adequately serve the population. As discussed above, the Little Tokyo Branch Library and Felipe de Neve Branch Library would continue operations without meeting recommended building standards under existing and future conditions. However, the Central Library and the other three local branch libraries (Pico Union, Chinatown and Echo Park) serving the Project Site would continue to meet the recommended building size standards, and it is likely that Project residents would frequent facilities based on proximity and/or their ability to provide adequate service. In addition, to the extent that Project residents may travel beyond the 2-mile service area, library usage would be dispersed between the libraries nearest the Project Site and those located farther away. Accordingly, the Project would not be anticipated to result in a substantial increase in demand that would necessitate new or physically altered buildings. **Therefore, the Project would not, by itself, result in the need for new or altered facilities, or substantially increase the demand for library services for which current demand exceeds the ability of the facility to adequately**

²⁹ City of Los Angeles, *Proposed Budget for the Fiscal Year 2020–2021*.

³⁰ Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the employee generation rate 0.004 employee per square foot for "High-Turnover Sit-Down Restaurant" land use is applied to the 7,499 square feet.

serve the population. As such, impacts on library facilities during operation of the Project would be less than significant.

(2) Mitigation Measures

Project-level impacts with regard to library services would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Project-level impacts related to library services 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

As identified in Section III, Environmental Setting, of this Draft EIR, there are 74 related projects located in the vicinity of the Project Site. The projected growth reflected by Related Project Nos. 1 through 74 is a conservative assumption, as some of the related projects may not be built out by 2025 (i.e., the Project buildout year), may never be built, or may be approved and built at reduced densities. To provide a conservative forecast, the future baseline forecast assumes that Related Project Nos. 1 through 74 are fully built out by 2025, unless otherwise noted. As also discussed in Section III, Environmental Setting, of this Draft EIR, the City Planning Department is currently updating the Central City Community Plan in conjunction with the Central City North Community Plan in a combined planning process often referred to as the DTLA 2040 Plan. The DTLA 2040 Plan, which once adopted, will be a long-range plan designed to accommodate growth in Central City until 2040. Only the initial period of any such projected growth would overlap with the Project's future baseline forecast, as the Project is to be completed in 2025, well before the DTLA 2040 Plan's horizon year. Moreover, 2025 is a similar projected buildout year as many of the related projects that have been identified. Accordingly, it can be assumed that the projected growth reflected by the list of related projects, which itself is a conservative assumption as discussed above, would account for any overlapping growth that may be assumed by the DTLA 2040 Plan upon its adoption.

Of these related projects, 58 related projects fall within a 2-mile radius of the libraries serving the Project Site and are residential in nature or have residential components. The residential population of a library's service area is the primary metric used by the LAPL for assessing the adequacy of library services and planning for future growth. The LAPL has not established any facilities criteria based on employment in a

library's service area. Notwithstanding, it is noted that some of the employees generated by the non-residential related projects could already be living within the service boundaries of the libraries serving the Project Site and already generating a demand for such services. Other employees not residing within the service boundaries of the libraries serving the Project Site would be more likely to use library facilities near their homes during non-work hours. Additionally, students attending an educational facility or school (i.e., Related Project Nos. 39, 55, and 64) would be more likely to utilize library services provided by the educational facility or school. As such, the non-residential related projects would not substantially contribute to the cumulative demand for library services.

As shown in Table IV.F.3-3 on page IV.F.3-19, implementation of the 58 applicable related projects would result in the development of 23,594 new residential units. Based on an average household size of 2.41 persons per household,³¹ the new residential units associated with the related projects would generate a service population of approximately 56,893 residents. Therefore, the applicable related projects and the Project's generation of 1,398 residents would add a total of approximately 58,291 residents to the service populations of the libraries identified by the LAPL. However, this estimate is likely overstated as it does not consider that much of the growth associated with the Project and related projects is already accounted for in the service population projections based on SCAG's growth projections. Furthermore, this estimate is considered conservative as it does not account for the removal of existing uses and their associated existing residential populations resulting from the development of the related projects.

Additionally, residents from 53 of the related projects would reside closer to the Central Library,³² and residents from five of the related projects would reside closer to the Little Tokyo Branch Library.³³ Therefore, these residents would be more likely to utilize libraries closer in proximity to their residence as their primary library(ies). Moreover, certain related projects would also be located within the service areas of other libraries beyond those serving the Project Site.

³¹ Based on a 2.41 persons per household rate for multi-family units based on the 2018 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020. As a note, the Initial Study for the 8th, Grand and Hope Project (Appendix A of this Draft EIR) applied an estimated rate of 2.43 persons per multi-family unit, which was the available rate provided by the City of Los Angeles at the time of publication of the Initial Study. This Draft EIR now utilizes the updated rate of 2.41 persons per multi-family unit provided by the City of Los Angeles

³² Related Project Nos. 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 14, 15, 17, 18, 20, 21, 22, 23, 24, 25, 29, 30, 32, 33, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 50, 51, 52, 53, 55, 57, 59, 60, 61, 62, 64, 65, 66, 67, and 73.

³³ Related Project Nos. 12, 16, 19, 26, and 28.

**Table IV.F.3-3
Related Projects with Cumulative Library Impacts**

No.^a	Project Name	Land Use	Units	Estimated Service Population^b
1	1247 S. Grand Ave.	Apartments	115 du	278
		Commercial	4,610 sf	
2	820 S. Olive St.	Apartments	589 du	1,420
		Retail	4,500 sf	
3	DTLA South Park—Site 1 1120 S. Grand Ave.	High-rise Apartments	536 du	1,292
		Commercial/Retail	14,061 sf	
4	Mixed-Use (Herald Examiner) 146 W. 11th St. (11th St./Broadway)	Apartments	391 du	943
		Office	39,725 sf	
		Retail	49,000 sf	
5	11th & Hill Project 1111 S. Hill St.	Condominium	528 du	1,273
		High-Turnover Restaurant	4,568 sf	
		Fast-Food Restaurant	1,523 sf	
6	Park/Fifth Project 427 W. 5th St.	Apartments	615 du	1,483
		Commercial	16,968 sf	
7	955 S. Broadway	Apartments	163 du	393
		Retail	6,406 sf	
8	SB OMEGA 601 S Main St.	High-rise Condo	452 du	1,090
		Retail	25,000 sf	
9	920 S. Hill St.	Apartments	239 du	576
		Condominiums	4 du	10
		Commercial	5,671 sf	
10	8th & Figueroa 744 S. Figueroa St.	Apartments	438 du	1,056
		Commercial/Retail	3,750 sf	
		Restaurant	3,750 sf	
11	1133 Hope St.	Condominiums	208 du	502
		Restaurant	5,029 sf	
12	433 S. Main St.	Condominiums	196 du	473
		Retail	5,300 sf	
		Restaurant	900 sf	
14	928 S. Broadway	Apartments	662 du	1,596
		Retail	47,000 sf	
		Live/Work (11,000 sf) ^c	11 du	27
		Office	34,824 sf	
15	1100 S. Main St.	Apartments	379 du	914
		Other	25,810 sf	
16	400 S. Broadway Mixed-Use Project 400-416 Broadway	Apartments	450 du	1,085
		Retail	7,500 sf	
17	737 S. Spring St.	Apartments	320 du	772
		Pharmacy	25,000 sf	

Table IV.F.3-3 (Continued)
Related Projects with Cumulative Library Impacts

No.^a	Project Name	Land Use	Units	Estimated Service Population^b
18	Foreman and Clark Building 400, 402 W. 7th St.; 701, 715 S. Hill St.	Apartments	165 du	398
		Bar	11,902 sf	
		Restaurant	14,032 sf	
19	649 S. Wall St.	Apartments	55 du	133
		Clinic	25,000 sf	
20	732 S. Spring St.	Apartments	400 du	964
		Pharmacy/Drug Store	15,000 sf	
21	340 S. Hill St.	Apartments	428 du	1,032
		Quality Restaurant	2,630 sf	
		Office	2,980 sf	
22	940 S. Hill St.	Apartments	232 du	560
		Retail	14,000 sf	
23	Apex Phase II 700 W. 9th St.	Condominiums	341 du	822
		Retail	11,687 sf	
24	Alexan South Broadway 850 S. Hill St.	Apartments	305 du	736
		Restaurant	3,500 sf	
		Retail	3,499 sf	
25	Grand Residence 1229 S. Grand Ave.	Condominiums	161 du	389
		Restaurant	3,000 sf	
26	Southern California Flower Market Project 755 S. Wall St.	Apartments	323 du	779
		Office	64,363 sf	
		Retail	4,385 sf	
		Wholesale/Storage	63,785 sf	
		Food/Beverage Space	13,420 sf	
		Event Space	10,226 sf	
28	Fashion District Tower 222 E. 7th St., 701 Maple St.	Apartment	452 du	1,090
		Retail	6,801 sf	
		Restaurant	6,802 sf	
29	5th & Hill Center 333 W. 5th St.	Condominiums	100 du	241
		Hotel	200 rm	
		Restaurant	27,500 sf	
		Meeting Rooms	4,500 sf	
30	845 S. Olive St.	Apartments	208 du	502
		Retail	810 sf	
		Other	1,620 sf	
32	1000 S. Hill St.	Apartments	700 du	1,687
		Retail	7,000 sf	
		Restaurant	8,000 sf	
33	888 S. Hope St.	Apartments	526 du	1,268

Table IV.F.3-3 (Continued)
Related Projects with Cumulative Library Impacts

No.^a	Project Name	Land Use	Units	Estimated Service Population^b
36	1201 S. Grand Ave.	Condominium	312 du	752
		Retail	7,100 sf	
37	Metropolis Mixed-Use 851 and 899 S. Francisco St. (8th St./Francisco St.)	Condominium	698 du	1,683
		Retail	65,000 sf	
38	1027 W. Wilshire Blvd. (Wilshire St./Paul St.)	Condominium	402 du	969
		Retail	4,728 sf	
39	LASED Entertainment District (Excluding development to date) Figueroa St./11th St.	Residential	1,264 du	3,047
		Educational	95,706 sf	
		Retail	138,583 sf	
		Restaurant	70,000 sf	
		Health Club	4,062 sf	
		Sport Bar/Night Club	14,409 sf	
		Hotel	183 rm	
40	1212 S. Flower St.	Apartments	730 du	1,760
		Retail/Restaurant	10,500 sf	
		Office	70,465 sf	
41	1150 W. Wilshire Blvd.	Condominiums	140 du	338
		Restaurant	4,830 sf	
		Retail	4,295 sf	
42	1218 W. Ingraham St.	Apartments	121 du	292
43	1145 W. 7th St.	Condominiums	241 du	581
		Commercial	7,291 sf	
44	Sapphire 1111 W. 6th St.	Apartments	369 du	890
		Retail	18,600 sf	
		Quality Restaurant	2,200 sf	
		Coffee Shop	1,200 sf	
45	675 S. Bixel St.	Apartments	425 du	1,025
		Hotel	126 rm	
		Retail	4,874 sf	
46	1235 W. 7th St.	Apartments	306 du	738
		Retail	5,959 sf	
47	LUXE Hotel 1020 S. Figueroa St.	Condominiums	650 du	1,567
		Hotel	300 rm	
		Restaurant	40,000 sf	
		Retail	40,000 sf	
48	945 W. 8th St.	Condominiums	781 du	1,883
		Retail	6,700 sf	

Table IV.F.3-3 (Continued)
Related Projects with Cumulative Library Impacts

No.^a	Project Name	Land Use	Units	Estimated Service Population^b
50	1045 S. Olive St.	Apartments	794 du	1,914
		Restaurant	12,504 sf	
51	1001 W. Olympic Blvd., 1015 W. Olympic Blvd.	Apartments	879 du	2,119
		Retail	20,000 sf	
		Restaurant	20,000 sf	
		Hotel	1,000 rm	
52	1018 W. Ingraham St.	Apartments	37 du	90
		Retail	1,890 sf	
53	Olympic Tower Project 815 W. Olympic Blvd.	Hotel	373 rm	
		Condominiums	374 du	902
		Retail	65,074 sf	
		Conference Center	10,801 sf	
		Office	33,498 sf	
55	Figueroa Centre 911 S. Figueroa St.	Condominiums	200 du	482
		Hotel	220 rm	
		Retail	29,080 sf	
		Restaurant	20,000 sf	
		Office	15,000 sf	
		Private School	200 stu	
57	949 S. Hope St.	Meeting Rooms	48,000 sf	
57	949 S. Hope St.	Apartments	236 du	569
		Restaurant	10,010 sf	
59	Morrison Hotel 1220 S. Hope St.	Apartments	135 du	326
		Hotel	450 rm	
		Bar/Lounge	3,060 sf	
		Restaurant/Retail	15,891 sf	
		Hotel/Residential Lobby	10,415 sf	
		Event/Meeting Space	14,052 sf	
		Amenities	39,199 sf	
60	350 S. Figueroa St.	Apartments	570 du	1,374
61	DTLA South Park—Site 2 1100 S. Olive St.	Apartments	713 du	1,719
		Commercial	7,125 sf	
		Restaurant	7,125 sf	
62	DTLA South Park—Site 3 1120 S. Olive St.	Apartments	537 du	1,295
		Commercial	3,794 sf	
		Restaurant	3,794 sf	

Table IV.F.3-3 (Continued)
Related Projects with Cumulative Library Impacts

No. ^a	Project Name	Land Use	Units	Estimated Service Population ^b
64	Angels Landing 361 S. Hill St.	Condominiums	180 du	434
		Apartments	261 du	630
		Hotel	509 rm	
		Charter School	38,977 sf	
		Commercial	36,551 sf	
65	1030 S. Hill St.	High-Rise Residential	700 du	1,687
		Retail	7,000 sf	
		Restaurant	8,000 sf	
66	Bunker Hill Tower 333 Figueroa St.	Apartments	224 du	540
		Hotel	599 rm	
		Condominiums	242 du	584
		Amenities	37,000 sf	
		Commercial	29,000 sf	
67	804 S. Garland Ave., 806 S. Garland Ave.	Apartments	118 du	285
		Office	69,295 sf	
		Retail	2,439 sf	
		Restaurant	1,132 sf	
		Gym/Spa	2,684 sf	
73	321 W. Olympic Blvd.	Apartments	263 du	634
		Commercial	14,500 sf	
Related Projects Service Population			23,594 du	56,893
Project Service Population			580 du	1,398
Total Service Population for Related Projects and Project			24,174 du	58,291

du = dwelling units

sf = square feet

stu = students

rm = rooms

Totals calculated have been rounded to the nearest whole number and may not sum due to rounding.

^a *This analysis of cumulative impacts to library services only includes the related projects that are residential in nature or have residential components.*

^b *Based on a rate of 2.41 persons per multi-family units based on the 2018 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, June 12, 2020. As a note, the Initial Study for the 8th, Grand and Hope Project (Appendix A of this Draft EIR) applied an estimated rate of 2.43 persons per multi-family unit, which was the available rate provided by the City of Los Angeles at the time of publication of the Initial Study. This Draft EIR now utilizes the updated rate of 2.41 persons per multi-family unit provided by the City of Los Angeles.*

^c *Based on the assumption that 1,000 square feet of live/work space provides approximately 1 dwelling*

Table IV.F.3-3 (Continued)
Related Projects with Cumulative Library Impacts

No. ^a	Project Name	Land Use	Units	Estimated Service Population ^b
<i>unit (i.e., 11,000 square feet = 11 dwelling units).</i> <i>Source: Eyestone Environmental, 2020.</i>				

Furthermore, 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.³⁴ These revenues to the City's General Fund would help offset the increase in demand for library services as a result of the Project and the related projects.

Nonetheless, based on the library sizing standards recommended in the 2007 Branch Facilities Plan, the projected cumulative future service population could warrant the addition of a new branch library and/or improvements or expansions to add capacity to some of the local libraries depending on actual population growth and future library usage.³⁵ Accordingly, the LAPL will continue to monitor population growth and land development in the City and identify additional resource needs, including staffing, materials equipment, and possibly facility expansions or new facility construction needs that may become necessary to achieve the required service standards. Through the City's regular budgeting efforts, LAPL's resource needs will be identified and allocated according to the priorities at the time. At this time, LAPL has not identified any new library construction in the area impacted by this Project. If LAPL 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 under CEQA Guidelines Section 15301 or 15332, or a Mitigated Negative Declaration, and, therefore, would not be expected to result in significant impacts.

³⁴ *City of Los Angeles, Proposed Budget for the Fiscal Year 2020–21.*

³⁵ *The Pew Research Center has found that library usage is declining: "The findings indicate a downward drift in the number of those who use physical library facilities in any given year. In our first survey on this in November 2012, 53 percent of adults had visited a library or bookmobile in the past 12 months. Over the same period, the use of library websites has leveled off. In 2013, 30 percent of adults had used a library website over the past 12 months, while the new finding is that 31 percent have done so in the past year. Additionally, we found that 9 percent of adults had used a library-related app in the past 12 months—a first time reading for this question." Source: Lee Rainie, "Libraries and Learning," Pew Research Center, April 2016, available at www.pewinternet.org/2016/04/07/libraries-and-learning/, accessed September 21, 2020.*

Based on the above, development of the Project and related projects would not result in the need for new or physically altered governmental facilities (i.e., libraries) the construction of which would cause significant environmental impacts. As such, cumulative impacts on libraries would be less than significant.

(2) Mitigation Measures

Cumulative impacts to library services would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Cumulative impacts related to library services 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.