4.12 PUBLIC SERVICES

This section describes public services and evaluates the construction and operational impacts associated with the Project. Topics addressed include fire protection, police protection, school services, and library services.

The three Project Sites are all owned by the County and located in the City of Los Angeles. Development of Site 2 would be subject to the zoning and building requirements of the City of Los Angeles. However, Sites 1 and 3 are not subject to City of Los Angeles regulatory controls. All public services would be provided by the City of Los Angeles to all three Sites, and therefore, policies of the City’s General Plan related to public services are addressed below.

FIRE PROTECTION AND EMERGENCY SERVICE

INTRODUCTION

This subsection describes the potential impacts of the Project on fire protection services in the Project area. Fire protection services would be provided by the City given the Project Sites’ location in the City. As such, this section uses information from the following resources: the Los Angeles Fire Department (“LAFD”) website, a written correspondence from the Los Angeles County Fire Department, the Fire Code chapter of the Los Angeles Municipal Code (“LAMC”), the Los Angeles General Plan Framework, and the Los Angeles General Plan Safety Element.

Furthermore, the courts have held that significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on public safety services are not an environmental impact that CEQA requires a project applicant to mitigate.

ENVIRONMENTAL SETTING

Existing Facilities and Services

Fire prevention, fire suppression, and life safety services in the City are provided by the LAFD. The LAFD has 3,246 uniformed personnel and 353 non-uniformed professional support staff. Services of the LAFD include fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service. As of March 2017, a professionally trained staff of 1,018 firefighters (including 270 paramedic-trained personnel) is on duty at all times at 106 neighborhood fire stations located across the LAFD’s 471 square-mile jurisdiction.

1 Written correspondence from the Los Angeles County Fire Department, in response to the NOP (see Appendix 1-2 to this Draft EIR), confirmed that the Project Sites would be serviced by LAFD, rather than County Fire.
3 Ibid.
The Project Sites are located in LAFD’s Central Bureau. The Central Bureau is further broken down into three battalions (Battalions 1, 2, 5, 7, 9, 11).

**Site 1**

Site 1 is served by Fire Station 6 located at 326 North Vigil Avenue, which is located approximately 1.3 miles northeast of Site 1. Fire Station 6 has a single-engine company and a paramedic rescue ambulance. Site 1 would be secondarily served by Fire Station 52 located at 4957 Melrose Avenue, which is approximately 2.3 miles northwest; and by Fire Station 20 located at 2144 W. Sunset Boulevard, which is approximately 2.6 miles. Fire Station 52 has an assessment engine and a paramedic rescue ambulance. Fire Station 20 has an assessment light force, a paramedic rescue ambulance, and a BLS rescue ambulance.

**Site 2**

Site 2 is served by Fire Station 6 located at 326 North Vigil Avenue, which is located approximately 1.3 miles northeast of Site 2. Fire Station 6 has a single-engine company and a paramedic rescue ambulance. Site 2 would be secondarily served by Fire Station 52 located at 4957 Melrose Avenue, which is approximately 2.3 miles northwest; and by Fire Station 20 located at 2144 W. Sunset Boulevard, which is approximately 2.6 miles northeast. Fire Station 52 has an assessment engine and a paramedic rescue ambulance. Fire Station 20 has an assessment light force, a paramedic rescue ambulance, and a BLS rescue ambulance.

**Site 3**

Site 3 is served by Fire Station 6 located at 326 North Vigil Avenue, which is located approximately 1.1 miles northeast of Site 3. Fire Station 6 has a single-engine company and a paramedic rescue ambulance. Site 3 would be secondarily served by Fire Station 52 located at 4957 Melrose Avenue, which is approximately 2.1 miles northwest; and by Fire Station 20 located at 2144 W. Sunset Boulevard.

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7 Ibid.
11 Ibid.
which is approximately 2.5 miles northeast.\textsuperscript{14} Fire Station 52 has an assessment engine and a paramedic rescue ambulance. Fire Station 20 has an assessment light force, a paramedic rescue ambulance, and a BLS rescue ambulance.\textsuperscript{15}

**Response Distance and Times**

The LAFD created FireStatLA in 2014 to track and evaluate data in order to improve response times citywide. FireStatLA and the online publication of LAFD response data formally launched on October 23, 2014. FireStatLA is aimed at increasing accountability, improving decision making and better allocating resources, with the primary goal of improving response times to better fulfill the mission of saving lives and protecting property.\textsuperscript{16} The data includes information on turnout time, travel time, and the number of incidences. Based on response metrics from January through February 2017, Fire Station No. 6 had an average response time for non-EMS calls of 3 minutes and 29 seconds and 3 minutes and 58 seconds for EMS calls.\textsuperscript{17} Under national standards set forth by the National Fire Protection Association, which have been adopted by LAFD, the response time goal is six minutes to nearly all medical emergencies.\textsuperscript{18} The travel time for Fire Station 6 is over two minutes faster than the national standard of six minutes.

**Fire Flow**

The City of Los Angeles Department of Water and Power (“LADWP”) currently provides water for fire flow to the Project Sites. Fire flows are supplied by the same water mains as the domestic water systems including the lines in local streets and major roadways. In general, fire flow requirements are closely related to land use as the quantity of water necessary for fire protection varies with the type of development, life hazard, type and level of occupancy, and degree of fire hazard (based on such factors as building age or type of construction). City-established fire flow requirements vary from 2,000 gallons per minute (“gpm”) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In all cases, a minimum residual water pressure of 20 pounds per square inch (“PSI”) is to remain in the water system while the required gpm of water is flowing.\textsuperscript{19}

Requirements for fire hydrant spacing and type of hydrant also vary by type of land development. Pursuant to Fire Code Section 57.09.06 of the LAMC, hydrants in commercial locations, such as the Project Sites, must serve a net land area of 80,000 square feet. Additionally, there must be a distance of 300 feet between hydrants on roads and fire lanes and 2.5-inch by 4.0-inch double fire hydrants must be used.


\textsuperscript{15} Ibid.


\textsuperscript{19} Los Angeles Municipal Code, Chapter V, Fire Service Features, Division 9, Fire Protection Water Supplies, Section 57.507.3.2.
Site 1

All water mains and lines that are designed and sized according to LADWP standards take into account fire flow and pressure requirements. Site 1 is currently served by existing LADWP water mains via a 30-inch-diameter water main beneath S. Vermont Street. Refer to Section 4.14 (Utilities and Service Systems – Water) for further discussion of water service infrastructure in the Project area.

Site 2

All water mains and lines that are designed and sized according to LADWP standards take into account fire flow and pressure requirements. Site 2 is currently served by existing LADWP water mains via a 24-inch water main beneath 6th Street. Refer to Section 4.14 (Utilities and Service Systems – Water) for further discussion of water service infrastructure in the Project area.

Site 3

All water mains and lines that are designed and sized according to LADWP standards take into account fire flow and pressure requirements. Site 3 is currently served by existing LADWP water mains via a 30-inch-diameter water main beneath S. Vermont Street. Refer to Section 4.14 (Utilities and Service Systems – Water) for further discussion of water service infrastructure in the Project area.

Regulatory Framework

Federal

No federal regulations are applicable to the Project.

State

California Fire Code

Title 24, Part 9 of the California Code of Regulations (“CCR”) is the California Fire Code and it sets forth regulations regarding building standards, fire protection and notification systems, fire protection devices such as fire extinguishers and smoke alarms, high-rise building standards, and fire suppression training. It contains regulations relating to construction, maintenance, and use of buildings. Topics addressed in the code also include emergency preparedness, fire service features, building services and systems, fire and smoke protection features, interior finishes, fire protection systems, means of egress, construction requirements, and use of hazardous and flammable materials. The 2016 California Fire Code incorporates the 2015 International Fire Code of the International Code Council with necessary California amendments.

Title 8 California Code of Regulations Sections 1270 and 6773

Title 8 Sections 1270 “Fire Prevention” and 6773 “Fire Protection and Fire Equipment,” of the CCR established minimum standards for fire suppression and emergency medical services. The standards

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20 Vermont Corridor Development Project Utility Infrastructure Technical Report prepared by KPFF Consulting Engineers, January 2016. The Infrastructure Technical Report is included as Appendix 4.16-1 to this Draft EIR.

21 Vermont Corridor Development Project Utility Infrastructure Technical Report prepared by KPFF Consulting Engineers, January 2016. The Infrastructure Technical Report is included as Appendix 4.16-1 to this Draft EIR.

22 Vermont Corridor Development Project Utility Infrastructure Technical Report prepared by KPFF Consulting Engineers, January 2016. The Infrastructure Technical Report is included as Appendix 4.16-1 to this Draft EIR.
include, but are not limited to, guidelines on the handling of highly combustible materials, fire hosing sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance, and use of all firefighting and emergency medical equipment.

**California Health and Safety Code**

Sections 13000 of the California Health and Safety Code define fire regulations, which include regulations for building standards (as set forth in the California Building Code), fire protection and notification systems, fire protection devices, and fire suppression training.

**Local**

**County of Los Angeles**

*Los Angeles County Fire Code (“Title 32”) and Building Code (“Title 26”)*

The County’s Fire Code and Building Code establish standards for the construction, design, and distribution of fire suppression facilities to ensure new developments comply with criteria required fire flow, minimum distance to fire stations, public and private fire hydrants, and access provisions for firefighting units. However, because the Project Sites are located in the City, the County would seek to comply with City requirements to ensure adequate fire protection, given that the City fire protection services would be provided for the Project Sites.

**City of Los Angeles**

*City of Los Angeles General Plan Framework Element*

The General Plan Framework Element was adopted by the Council on December 11, 1996, and includes nine chapters; which establish framework elements for; land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation and infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the City of Los Angeles General Plan Framework Element, establishes goals, objectives and policies for the provision of infrastructure and public services within the City. The Framework Element also outlines the necessary actions that the City must implement in order for the provision of public services and infrastructure to remain viable, sustainable and able to support the public services needs associated with the growth of the population and economy.

Specifically, Goal 9J of the General Plan Framework Element establishes the primary goal that “every neighborhood has the necessary level of fire protection services, EMS and infrastructure.”

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

- **Objective 9.16**: Monitor and forecast demand for existing and projected fire facilities and services.
  - **Policy 9.16.1**: Collect appropriate fire and population development statistics for the purpose of evaluating fire services needs based on existing and future conditions.

- **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.
Policy 9.17.4: Consider the Fire Department’s concerns and, where feasible adhere to them, regarding the quality of the area’s fire protection and EMS when developing general plan amendments and zone changes, or considering discretionary land use permits.

- Objective 9.18: Phase the development of new fire facilities with growth.
- Objective 9.19: Maintain the LAFD’s ability to assure public safety in emergency situations.

City of Los Angeles General Plan Safety Element

The City Council adopted the Safety Element of the General Plan on November 26, 1996. The Safety Element replaced three previously adopted elements of the General Plan: the 1975 Safety Element, the 1979 Fire Protection and Prevention Element, and 1974 Seismic Safety Element. The Safety Element, relative to the provision of fire services, outlines a history of fire rescue and the establishment of the Fire Department in the City of Los Angeles. Furthermore, the Safety Element establishes goals and policies regarding emergency response time and minimum standards for LAFD facilities. Specifically, Policy 2.1.6 (Standards/Fire) requires the LAFD to “continue to maintain, enforce and upgrade requirements, procedures and standards to facilitate more effective fire suppression.” Policy 2.1.6 is implemented through the components, requirements and standards of the LAMC Fire Code, which is discussed in detail below, such as peak load water requirements, and other standard code requirements including road widths, access, clearances around structures, and other standards or procedures relative to fire suppression. Additionally, Policy 2.1.6 forms the basis for the LAMC requirements regulating the minimum standards for the location and expansion of fire facilities based upon fire flow requirements, intensity and type of land use, life hazard, occupancy and degree of hazard so as to provide adequate fire and emergency medical response within the City.

Los Angeles Fire Code

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

Division 118 of the LAMC, Fire Code, is comprised of 12 sections that provide fire protection and suppression design guidelines for all new high-rise buildings in the City. These sections include the following requirements and design incorporations: fire control room requirements; building communication requirements; LAFD communication systems; elevator system requirements; fire protective signaling systems; emergency smoke control systems; standby and emergency power systems; stair shaft doors; pressurized shaft doors; automatic sprinkler systems and emergency helicopter landing facilities. As of September 24, 2014, the LAFD has revised the mandatory policy for high-rise buildings over 75 feet in height to have a required helipad. New buildings shall be required to have a separate elevator for firefighters with communication systems inside, cameras, additional wider stairwells, state of
the art smoke detectors, and alarm systems.\textsuperscript{23} If the new building incorporates these measures, a helipad is not required.

**ENVIRONMENTAL IMPACTS**

**Methodology**

In accordance with standard LAFD methodology, adequate fire protection is determined based on the required fire flows for the land uses proposed, distance to the nearest fire station for the land uses proposed, and hydrant and access improvements. The following discussion addresses the Project’s potential impacts on fire protection services based on fire flows, response distance, and LAFD review of hydrants and access.

**Thresholds of Significance**

The potential for the proposed Project to result in impacts associated with fire protection services is based on the CEQA significance thresholds specified by Appendix G of the State CEQA Guidelines, which are addressed in this section. The applicable significance threshold is listed below.

**Threshold 4.12-1:** Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection?

An affirmative answer to this question would represent a significant impact.

**Project Design Elements**

The Project would implement a staging and traffic plan for each of the Project Sites that would provide for on-site security, and ensure adequate routing and access for vehicles and pedestrians during construction periods.

**Impact Analysis**

**Threshold 4.12-1:** Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection?

\textit{Site 1}

\textit{Construction}

Construction on Site 1 would temporarily create the potential for accidental fires from such sources as mechanical equipment and flammable construction materials. In most cases, implementation of “good

\textsuperscript{23} Los Angeles Fire Department Requirement No. 10, Emergency Helicopter Landing Facilities Requirements.
“housekeeping” procedures by construction contractors and work crews would minimize these hazards. Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. These impacts are considered to be less than significant for the following reasons:

- Emergency access would be maintained to Site 1 during construction through marked emergency access points approved by the LAFD (see PDFs, below);
- Construction impacts are temporary in nature and do not cause lasting effects to impact LAFD fire protection services;
- Partial lane closures, if determined to be necessary, would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding Site 1, flagmen would be used to facilitate the traffic flow until construction is complete (see PDFs, below); and
- The Developer would be required to prepare a Construction Staging and Traffic Management Plan (see PDFs, below) that would address traffic and access control during construction.

Accordingly, Site 1 construction would not affect firefighting and emergency services to the extent that new, expanded, consolidated, or relocated fire facilities would be needed in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. Therefore, construction-related impacts on fire protection services would be less than significant.

**Operation**

The increase in employees and visitors to Site 1 during operation could increase demand for fire protection services. The following discussion considers the LAFD’s primary criteria for determining the development on Site 1’s impacts on fire protection services, including fire flows, response distance and time, and LAFD review of hydrants and access.

**Fire Flows**

In accordance with the Fire Code, the Site 1 development would be reviewed as an office use. The minimum fire flow requirement for Site 1 would be 6,000 gpm to 9,000 gpm flowing from four to six hydrants at the same time; however, this amount is subject to a field inspection of the general area as well as the Site 1 development, and could increase. A minimum residual water pressure of 20 pounds PSI is to remain in the water system while the required gpm of water is flowing. The final fire flow required for the Site 1 development would be established by the County during its review of the Site 1 plot plan, prior to the issuance of building permits. The plot plan would be required to identify the minimum fire flow requirements and the location of fire hydrants. Approval of this plot plan and implementation of the applicable regulatory requirements would ensure the requisite fire flow for the Site 1. Therefore, impacts related to fire flow would be less than significant.

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24 *Los Angeles Fire Department Fire Code, Section 57.09.06.*
Response Distances and Times

As discussed in Section 4.14 (Transportation and Traffic), after implementation of mitigation measures, including a Transportation Demand Management (“TDM”) program, the Project would result in 10 significant peak hour impacts at seven intersections at Project buildout. Response times would not be greatly affected because emergency vehicles normally have a variety of options for avoiding traffic such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, emergency response times would not be greatly affected. In addition, upon completion of Site 1 construction, the LAFD would be provided with a diagram of each portion of the property, and this diagram would include access routes and any additional information that may facilitate LAFD response to the Site 1.

A project site should be within the one-mile fire response distance for an engine company and 1.5-mile response distance for a truck company. When response distances exceed these recommendations, all structures must be equipped with automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems.). Site 1 is located approximately 1.3 miles from Fire Station 6, which houses an engine company, but does not contain a truck company. The nearest truck company would be provided from Fire Station 20, which is approximately 2.6 miles from Site 1. Because the response times for non-EMS and EMS calls at Fire Station 6 and Fire Station 52 are within the required 6 minutes and the travel time is faster than the citywide average, Site 1 is adequately served by existing fire protection services.²⁵ Regardless, and in keeping with guidance that sprinklers be installed for sites located greater than 1.0 from an engine company and 1.5 miles from a truck company, Site 1 development would be equipped with a sprinkler system, safety features, and an emergency helistop as required by the County Fire Code. Conformance with applicable Fire Code and County building requirements, as identified in Regulatory Requirements RR-PS-1 through RR-PS-3, would provide adequate on-site fire protection. In addition, as required by the County Code, Site 1 would include an Emergency Helicopter Landing Facility (“EHLF”). The EHLF consists of a clear area on the roof of the building capable of accommodating a helicopter engaged in firefighting and/or emergency evacuation operations. Because Site 1 development would not have a significant impact on fire protection with regards to response distances and times, it would not require the addition of a new fire station or expansion, or consolidation or relocation of an existing facility to maintain service. Therefore, impacts would be less than significant.

Emergency Access

Emergency vehicle access to Site 1 would continue to be provided from major roadways adjacent to the Site 1 including Vermont Avenue and Shatto Place. Vehicular and pedestrian access to the new Site 1 office building would be provided from Vermont Avenue. Two driveways, located immediately north and south of the proposed new building, would lead to the parking levels. Ingress would be provided from the south driveway, and egress would be provided from the north driveway. Access to the new Shatto Place parking structure would be from two driveways on Shatto Place. Ingress and egress would be provided from both the north driveway and south driveways. In addition, Site 1 would include an emergency helistop on the roof of the proposed office building for emergency access. All circulation improvements, described in Section 4.14 (Transportation and Traffic) of this EIR, that are proposed for

Site 1 would comply with the Fire Code, including any additional access requirements of the LAFD. Emergency access to the Site 1 would be maintained at all times.

While development on Site 1 would affect the level of service of roadways in the vicinity, the increases in traffic would not greatly affect emergency vehicles because the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Based on the Site 1 proposed circulation plan and the above considerations, it is anticipated that the LAFD would be able to respond to emergency calls within the established response time. Because the Project would not have a significant impact on fire protection with regards to emergency access, it would not require the addition of a new fire station or expansion, or consolidation or relocation of an existing facility to maintain service. Therefore, impacts would be less than significant.

**Site 2**

**Construction**

The construction impacts for Site 2 would be less than significant for the same reasons described under Site 1, above. Accordingly, Site 2 construction would not affect firefighting and emergency services to the extent that new, expanded, consolidated, or relocated fire facilities would be needed in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. Therefore, construction-related impacts on fire protection services would be less than significant.

**Operation**

**Fire Flows**

In accordance with the Fire Code, the Site 2 development would be reviewed as a mixed-use. The minimum fire flow requirement for Site 2 would be 4,000 gpm flowing from four hydrants at the same time; however, this amount is subject to a field inspection of the general area as well as the Site 2 development, and could increase. The impacts related to fire flow for Site 2 would be less than significant for the reasons described under Site 1, above. Therefore, Site 2 impacts related to fire flow would be less than significant.

**Response Distances and Times**

The impacts related to response times for Site 2 would be less than significant for the reasons described under Site 1, above. Therefore, Site 2 Project impacts related to response times would be less than significant.

As described previously, a project site should be within the one-mile fire response distance for an engine company and 1.5-mile response distance for a truck company. Site 2 is located approximately 1.3 miles from Fire Station 6, which houses an engine company, however it does not contain a truck company. The nearest truck company would be provided from Fire Station 20, which is approximately 2.6 miles from Site 2. The turnout time for non-EMS and EMS calls at Fire Station 6 and Fire Station 52 are within the required 6 minutes and the travel time is faster than the citywide average, Site 2 is adequately served by

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26 *Los Angeles Fire Department Fire Code, Section 57.09.06.*
existing fire protection services. Regardless, and in keeping with guidance that sprinklers be installed for sites located greater than 1.0 from an engine company and 1.5 miles from a truck company, the Site 2 Project would be equipped with a sprinkler system and the safety features as required by the Fire Code. Conformance with applicable Fire Code and LAFD building requirements, as identified in Regulatory Requirements RR-PS-1 through RR-PS-3, would provide adequate on-site fire protection. Therefore, Site 2 Project impacts related to response times would be less than significant.

**Emergency Access**

Emergency vehicle access to Site 2 would continue to be provided from major roadways adjacent to the Site 2 including Vermont Avenue and W. 6th Street. Vehicular and pedestrian access to the Site 2 residential building would be provided from W. 6th Street. All circulation improvements, described in Section 4.14 (Transportation and Traffic) of this EIR, that are proposed for Site 2 would comply with the Fire Code, including any additional access requirements of the LAFD. Emergency access to the Site 2 would be maintained at all times.

While development on Site 2 is anticipated to affect the level of service of roadways in the Project vicinity, the increases in traffic would not greatly affect emergency vehicles because the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Based on the Project’s proposed circulation plan and the above considerations, it is anticipated that the LAFD would be able to respond to emergency calls within the established response time. Therefore, Site 2 Project impacts related to emergency access would be less than significant.

Because the Site 2 development would not have a significant impact on fire protection with regards to fire flow, response times, or emergency access, it would not require the addition of a new fire station or expansion, or consolidation or relocation of an existing facility to maintain service. Therefore, impacts would be less than significant.

**Site 3**

**Construction**

The construction impacts for Site 3 would less than significant for the reasons described under Site 1, above. Accordingly, Project construction would not affect firefighting and emergency services to the extent that new, expanded, consolidated, or relocated fire facilities would be needed in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. Therefore, construction-related impacts on fire protection services would be less than significant.

**Operation**

**Fire Flows**

In accordance with the Fire Code, the Site 3 development would be reviewed as a mixed-use. The minimum fire flow requirement for Site 3 would be 4,000 gpm flowing from four hydrants at the same

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time; however, this amount is subject to a field inspection of the general area as well as the Project, and could increase. The impacts related to fire flow for Site 3 would be less than significant for the reasons described under Site 1, above. Therefore, Site 3 Project impacts related to fire flow would be less than significant.

Response Distances and Times

The impacts related to response times for Site 3 would be less than significant for the reasons described under Site 1, above. Therefore, project impacts related to response times would be less than significant.

As described previously, a project site should be within the one-mile fire response distance for an engine company and 1.5-mile response distance for a truck company. When response distances exceed these recommendations, all structures must be equipped with automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems.). The Site 3 is located approximately 1.1 miles from Fire Station 6, which houses an engine company, however it does not contain a truck company. The nearest truck company would be provided from Fire Station 20, which is approximately 2.6 miles from Site 3. The turnout time for non-EMS and EMS calls at Fire Station 6 and Fire Station 52 are within the required 6 minutes and the travel time is faster than the citywide average, Site 3 is adequately served by existing fire protection services. Regardless, and in keeping with guidance that sprinklers be installed for sites located greater than 1.0 from an engine company and 1.5 miles from a truck company, the Site 3 development would be equipped with a sprinkler system and the safety features listed under the PDFs, above. Conformance with applicable Fire Code and County building requirements, as identified in Regulatory Requirements RR-PS-1 through RR-PS-3, would provide adequate on-site fire protection. Therefore, impacts related to response times would be less than significant.

Emergency Access

Emergency vehicle access to Site 3 would continue to be provided from major roadways adjacent to Site 3 including Vermont Avenue. The entrance to the proposed community recreation center would be provided on Vermont Avenue. A separate entrance to the proposed residential units, and vehicular access to the below ground parking structure that would serve the residential and community recreation center uses would be also provided from Vermont Avenue. All circulation improvements, described in Section 4.14 (Transportation and Traffic) of this EIR, that are proposed for Site 3 would comply with the Fire Code, including any additional access requirements of the LAFD. Emergency access to Site 3 would be maintained at all times.

While development on Site 3 is anticipated to affect the level of service of roadways in the vicinity, the increases in traffic would not greatly affect emergency vehicles because the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Based on the Site 3 proposed circulation plan and the above considerations, it is anticipated that the LAFD would be able to respond to emergency calls within the established response time. Therefore, impacts related to emergency access would be less than significant.

28 Los Angeles Fire Department Fire Code, Section 57.09.06.
Because the Site 3 development would not have a significant impact on fire protection with regards to fire flow, response times, or emergency access, it would not require the addition of a new fire station or expansion, or consolidation or relocation of an existing facility to maintain service. Therefore, impacts would be less than significant.

CUMULATIVE IMPACTS

The geographic scope of the cumulative fire protection analysis encompasses the service area for the LAFD in general, and Fire Station 6 in particular. The Project, in combination with the construction and operation of the 115 related projects, would result in additional residents and commercial land uses within these service areas. It is anticipated that the additional population and commercial activity would increase the demand for fire protection in the service areas for LAFD Fire Station 6. Specifically, there would be increased demand for additional LAFD staffing, equipment, and facilities over time.

The LAFD determines adequate fire protection based on fire flows, response distance, and LAFD review of hydrants and access. As discussed previously, any related project that exceeds the maximum applicable response distance standards of LAMC Fire Code Section 57.507.3.3 or are considered high-rise structures exceeding 75 feet in height under Fire Code Section 57.4705, would be required to install automatic fire sprinkler systems. In addition, each of the related projects would be subject to LAFD review of site plans, hydrant locations, and fire flow requirements.

In addition to the capabilities of the local fire stations serving the Project Sites and surrounding areas, including the related projects, growth in residential population and commercial development throughout the City could increase demand for LAFD staffing, equipment, and facilities. These demands are met by LAFD within the constraints of available resources, as well as through the allocation of resources between LAFD and other City departments, which is accomplished through the City’s annual programming and budgeting processes. Through implementation of the existing management and regulatory requirements, the cumulative demand for fire protection is identified and addressed to the satisfaction of the City’s elected leadership. Therefore, the Project, in combination with demand for fire protection services citywide, would not result in cumulatively considerable effects and would not require the addition of a new fire station or expansion, or consolidation or relocation of an existing facility to maintain service. Further, the Project impact analysis determined the impact on fire protection would be less than significant; thus, Project impacts would not be cumulatively considerable. Based on the above analysis, cumulative impacts related to fire protection would be less than significant.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

The following Project Design Features (“PDFs”) would be incorporated into the Project via entitlements and would work to address Project impacts. These are not required mitigations but are inherent Project components.

PDF PS-1: The Developer shall implement a Construction Staging and Traffic Management Plan (“CSTMMP”) addressing construction activity on each of the three sites that would outline provisions for on-site security during construction, which could include, but are not limited to, temporary security fencing (e.g., chain-link fencing), low-level security lighting, and locked-entry (e.g., padlock gates or guard-restricted access) to limit access by the general public, and providing security personnel to man and patrol the site outside of
active construction hours. Additionally, the Construction Staging and Traffic Management Plan shall ensure that routine and emergency access to and around each Site for vehicles and pedestrians is maintained at all times during construction through well-marked entrances.

Regulatory Requirements

**RR PS-1:** The Project shall comply with all State and local building codes relative to fire protection, safety, and suppression. Specifically, the Project design shall incorporate the standards and requirements as set forth by California Code of Regulations (“CCR”) Title 24 standards, the City of Los Angeles Safety Element, and the County Fire Code (Sites 1 and 3) and LAMC Fire Code (Site 2).

**RR PS-2:** The Project Developer shall submit a plot plan for approval of access and hydrants by the County Fire Department for Sites 1 and 3, or LAFD for Site 2, prior to the issuance of building permits. The County Fire Department shall coordinate its findings with respect to Sites 1 and 3 with LAFD. The plot plan shall include fire prevention and access features to the satisfaction of the County or LAFD, including the following standard requirements:

- Access for Fire Department apparatus and personnel to and into all structures shall be required.
- Any required Fire Annunciator panel or Fire Control Room shall be located as required by the Fire Code.
- Any required fire hydrants to be installed shall be fully operational and accepted by the LAFD prior to any building occupation.
- All water systems and roadways are to be improved to the satisfaction of the LAFD prior to any building occupation.
- All structures shall be fully sprinklered pursuant to the Fire Code.
- No building or portion of a building shall be constructed more than 150 feet from the edge of a designated fire lane.
- No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along the path of travel.

**RR PS-3:** The Project on Sites 1 and 2 would be built in compliance with the high-rise provisions in the Fire Code and Building Code pertaining to fire-resistant building materials and smoke control. The following safety measures would be implemented.

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

- **LAFD Access**: Access for LAFD apparatus and personnel to each Site would be in accordance with the LAFD requirements.

### MITIGATION MEASURES

No significant impacts related to fire services have been identified; therefore, no mitigation measures are required.

### LEVEL OF SIGNIFICANCE AFTER MITIGATION

Construction and operational impacts related to fire protection and emergency services would be less than significant.

### POLICE PROTECTION SERVICES

#### INTRODUCTION

This subsection evaluates the potential impacts of the Project on police protection services and facilities in the Project area. Police protection services will be provided by the City given the Project Sites’ location in the City. As such, this section uses information from the following resources: the Los Angeles Police Department (“LAPD”) website, Los Angeles General Plan, and written correspondence with Officer Christopher Gibson, Community Relationship Division, LAPD (Appendix 4.12-1 to the Draft EIR).

Furthermore, the courts have held that significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on public safety services are not an environmental impact that CEQA requires a project applicant to mitigate.

#### ENVIRONMENTAL SETTING

**Existing Police Service**

Police protection services in the City are provided by the LAPD. The LAPD is divided into four bureaus: Central Bureau, South Bureau, Valley Bureau, and West Bureau. Each of the bureaus encompasses several community police stations.

**Existing Police Stations**

The Project Sites are located within the LAPD West Bureau. The Project Sites would be served by the Olympic Community Police Station located at 1130 South Vermont, approximately 0.5 mile south of the Project Sites, and in Reporting District 2029 within the Olympic area. The Olympic Community Police Station covers 6.2 square miles. For the purposes of the LAPD, the Olympic Community boundaries are defined as: Melrose Avenue and Beverly Boulevard to the north, Santa Monica Freeway to the south,

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30 **Correspondence from Officer Christopher Gibson, Community Relationship Division, Los Angeles Police Department, dated February 15, 2017.**
Hoover Street and Normandie Avenue to the east, and Arlington Avenue, Crenshaw Boulevard, Plymouth Boulevard, and Gower Street to the west. The station currently has 235 sworn officers and 14 civilian staff, representing an officer to population ratio of one officer per approximately 851 residents. Additionally, there are special service teams available in the LAPD to service the Olympic Area. The City has not set an official standard with respect to officer to population ratio.

**Response Times**

Response time represents the period of time elapsed from the initiation of an assistance call to the appearance of a police unit at the scene. Calls for police assistance are prioritized based on the nature of the call. Unlike fire protection services (as discussed in Section 4.12 [Public Services – Fire Protection] above), police units are most often in a mobile state; therefore, the distance between a police station and a project site is of little relevance. Instead, the number of deployed police officers is more directly related to the response time. The average response time to emergency calls for service for the Olympic Community Station in 2016 was approximately 3.1 minutes. The average response time to non-emergency calls for service for the Olympic Community Station in 2016 was approximately 21.4 minutes.

**LAPD Review**

The LAPD recommends that developers of large-scale projects contact them for advice with regard to crime prevention features that may be incorporated into the project design. With incorporation of standard project design features, the Project would comply with LAPD’s “Design Out Crime” program that encourages project design that incorporates strategies from Crime Prevention through Environmental Design (“CPTED”). CPTED is a method of reducing the amount of police officers required by addressing public safety through a series of strategies and design recommendations. Design recommendations use location of activities within a project site to enhance safety, including, the use of designated walkways, security lighting, entryways, and other security features (locks/gates/signs). These design recommendations reduce crime by providing a natural surveillance and discouraging criminal activity.

**Regulatory Framework**

**Federal**

No federal regulations apply to the Project.

**State**

**California Penal Code**

All law enforcement agencies in the State of California are organized and operated in accordance with the applicable provisions of the California Penal Code. This code sets forth the authority, rules of conduct,

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31 Ibid.
32 Ibid.
33 Ibid.
and training for peace officers. Under State law, all sworn municipal and County’s officers are State peace officers.

Local

**County of Los Angeles**

Because the Project Sites are located in the City, the County would seek to comply with City requirements to ensure there is adequate police protection, given that City services would provide police protection services for the Project Sites.

**City of Los Angeles**

**City Charter**

Under the City Charter, the Board of Police Commissioners (Police Commission) oversees the LAPD. The Police Commission sets overall policy while the Chief of Police manages the daily operations of the LAPD and implements the Commission’s policies.

**Los Angeles General Plan Framework Element**

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

- **Goal 9.1:** Every neighborhood in the City has the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.
  - **Objective 9.13:** Monitor and forecast demand for existing and projected police service and facilities.
    - **Policy 9.13.1:** Monitor and report police statistics and population projections for the purpose of evaluating existing and future police needs.
  - **Objective 9.14:** Protect the public and provide adequate police services, facilities, equipment and personnel to meet existing and future needs.
    - **Policy 9.14.7:** Participate fully in the planning of activities that assist in defensible space design and utilize the most current law enforcement technology affecting physical development
  - **Objective 9.15:** Provide for adequate public safety in emergency situations.

In addition, the Safety Element of the Los Angeles General Plan addresses natural hazard issues related to LAPD resources (e.g., traffic safety during or following a disaster) and recognizes that most jurisdictions rely on emergency personnel (police, fire, gas, and water) to respond to emergencies. The Safety Element objectives are broadly stated to reflect the comprehensive scope of the Emergency Operations Organization, including the LAPD. The Safety Element’s policies outline administrative considerations that are addressed by Emergency Operations Organization procedures, including:
• **Objective 2.1:** Develop and implement comprehensive emergency response plans and programs that are integrated with each other and with the City’s comprehensive hazard mitigation and recovery plans and programs.

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

**LAPD Guidelines and Plan Review**

Prior to the issuance of a certificate of occupancy for each construction phase and ongoing during operations, projects subject to review by the City are required to develop an Emergency Procedures Plan to address emergency concerns and practices. The plan is subject to review by LAPD. Additionally, projects are to comply with the design guidelines outlined in the LAPD *Design Out Crime Guidelines*, which recommend using natural surveillance to maximize visibility, natural access control that restricts or encourages appropriate site and building access, and territorial reinforcement to define ownership and separate public and private space. Specifically, projects are recommended to:

- Provide on-site security personnel whose duties shall include but not be limited to the following:
  - Monitoring entrances and exits;
  - Managing and monitoring fire/life/safety systems;
  - Controlling and monitoring activities in parking facilities;
- Install security industry standard security lighting at recommended locations including parking structures, pathway options, and curbside queuing areas;
- Install closed-circuit television at select locations including (but not limited to) entry and exit points, loading docks, public plazas and parking areas;
- Provide adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment;
- Provide lighting of building entries, pedestrian walkways, and public open spaces to provide pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings;
- Design public spaces to be easily patrolled and accessed by safety personnel;
- Design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites; and
- Limit visually obstructed and infrequently accessed “dead zones.”

**ENVIRONMENTAL IMPACTS**

**Methodology**

The environmental impacts of the Project with respect to police protection are determined based on a project’s need for a new or physically altered police station. While current response times, crime statistics, and the LOS at surrounding intersections are relevant background information, these data are not used to determine police protection impacts under CEQA. The adequacy of police protection is evaluated using the existing number of police officers in the project’s police service area, the number of persons currently served in the area, the adequacy of the existing officer-to-population ratio in the area, and the number of persons that the project would introduce to the area. Using these statistics, it is possible to estimate the future officer-to-population ratio in the area at project buildout and the number of officers that would be necessary to maintain the existing level of police protection (or, if the existing
level is not considered adequate, the number required to obtain an adequate level of police protection). The need for additional officers can be reduced through on-site security design features. The increase in officers is then determined to be either accommodated within the existing police station(s) in the area, or may require the construction of a new or expansion of an existing police station, which in turn would cause environmental impacts.

**Thresholds of Significance**

The potential for the proposed Project to result in impacts associated with police protection services is based on the CEQA significance thresholds specified by Appendix G of the State CEQA Guidelines, which are addressed in this section. The applicable significance threshold is listed below.

**Threshold 4.12-2:** Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection?

An affirmative answer to this question would represent a significant impact.

**Project Design Elements**

The Project would implement a staging and traffic plan for each of the Project Sites that would provide for on-site security, and ensure adequate routing and access for vehicles and pedestrians during construction periods. The Project would implement the Project Design Features ("PDF") representing state-of-the-art design principles that are intended to enhance the security of project buildings through design, and minimize the potential for impacts during operation. The PDFs would be incorporated into the Project and are considered a part of the Project for purposes of the impact analysis.

**Impact Analysis**

**Threshold 4.12-2:** Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection?

**Site 1**

**Construction**

Construction sites can be sources of attracting nuisances, creating hazards, and inviting theft and vandalism. When not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters. Consequently, developers typically take precautions to prevent trespassing through construction sites. Most commonly, temporary fencing is installed around the construction site, which would be part of the Project as a design feature (see PDF PS-1, above). Deployment of on-site security guards is also an effective strategy in preventing crime during a project’s construction, and providing security personnel to man and patrol the site outside of active construction hours for the duration of the construction period would be part of the Project as a design feature (see PDF PS-1). While there is the potential for the construction on Site 1 to increase the demand for police
protection services, Site 1 would provide security fencing and personnel to the Site during construction. When such precautions are taken, there is generally less need for local law enforcement service at the construction site, thereby reducing the demand for LAPD services. Accordingly, Site 1 construction would not affect police services to the extent that new, expanded, consolidated, or relocated police facilities would be needed in order to maintain acceptable service ratios, response times, or other performance objectives of the LAPD. Therefore, construction-related impacts on police protection services would be less than significant.

Traffic generated by construction workers and trucks would occur primarily during off-peak hours. Emergency access would be maintained to the Site 1 during construction through marked emergency access points approved by the LAPD, and the Project would implement a Construction Staging and Traffic Management Plan (CSTMP, see PDF-PS-1, above). Therefore, as traffic impacts (as they relate to response times) would not result in the need for expanded, consolidated, or relocated police facilities during construction of Site 1 Project impacts would be less than significant.

Operation

Although there is no direct proportional relationship between increases in land use activity and increases in demand for police protection services, the number of calls for police response to residential, commercial and vehicle burglaries, damage to vehicles, traffic-related incidents, and crimes against persons could increase with the increase in on-site activity and increased traffic on adjacent streets and arterials. Such calls are typical of problems experienced in nearby neighborhoods and do not represent unique law enforcement issues specific to Site 1. Design features that deter crime, including adequate and strategically positioned functional lighting to enhance public safety, minimizing visually obstructed and infrequently accessed “dead zones,” and limiting public access to properly patrolled public areas, reduce the demand for police services. The design of Site 1 would also include crime prevention features, such as nighttime security lighting, secured parking facilities, and on-site security cameras incorporated as a project design feature, as described in PDF-PS-2, below. Further, as a County building, on-site security personnel are provided at all times the building is in operation, and would be responsible for controlling access and responding to on-site incidents as required, with the LAPD serving only as backup. Therefore, with implementation of these design features and the current adequate level of LAPD service, there would be no need for provision of new or physically altered police facilities and Site 1 development would result in a less-than-significant operational impact on police protection services.

Officer-to-Population Ratio

Implementation of the Project would result in an increase of employees and site visitors within Site 1, thereby generating a potential increase in the number of service calls from Site 1. As discussed in Section 4.11 (Population, Housing and Employment), the Site 1 and Site 2 employment components of the Project are linked, in that the majority of employees that will be located on Site 1 after Project completion would be relocated from existing County facilities on Site 2. As shown in Table 4.11-3 (Estimated Permanent Employment Generation for the Project), the net increase in employment on Sites 1 and 2 as a result of the Project would be 907 employees by 2023. Since the current officer to population ratio within the Olympic Community Station service area is one officer per approximately 851 residents (200,000 division
population ÷ 235 officers = approximately 851), the addition of up to 907 employees could create demand for one additional officer.

However, the County would provide on-site security personnel for the County office building on Site 1, which would reduce the need for police services. In addition, the development on Site 1 would incorporate crime prevention measures into project design as well as implement comprehensive safety and security measures, including adequate and strategically positioned functional and thematic lighting to enhance public safety. The measures are incorporated into the Project as Project Design Features, listed below. Visually obstructed and infrequently accessed “dead zones” would be limited and, where possible, security controlled to limit public access. The buildings and layout design of Site 1 would also include crime prevention features, such as nighttime security lighting and a secure parking structure. These preventative and proactive security measures would decrease the amount of service calls the LAPD would receive. In sum, any minimal effect which the development of Site 1 would have on officer staffing levels would not cause service levels to decline within the Olympic Community station area or require the need for provision of new or physically altered police facilities, and impacts would be less than significant.

Using the existing officer to population ratio for the Olympic Community Station, the development on Site 1 could warrant the addition of one new officer to maintain the existing office to population ratio in the Olympic Community Police Station service area, if the LAPD chooses to pursue additional staffing at this station. Since the Olympic Community Police Station currently accommodates approximately 250 personnel, it is not anticipated that this level of additional staffing would require the enlargement or the construction of a police station, the construction of which would cause significant environmental impacts. Therefore, impacts would be less than significant.

Response Times

As discussed in Section 4.14 (Transportation and Traffic), after implementation of mitigation measures, including a TDM program, the Project would result in up to 10 peak hour impacts at seven intersections, depending upon the phase of Project completion. As previously discussed, police units are most often in a mobile state; therefore, it is unknown precisely which route the LAPD would use to access Site 1 when responding to an emergency call. Response times would not be substantially affected, given that there would be significant traffic impacts at limited locations and given the availability of alternative routes within the street pattern in the area surrounding Site 1. In addition, the police have a variety of options to avoid traffic, such as using sirens to clear a path of travel for driving in the lanes of opposing traffic. Furthermore, upon completion of construction on Site 1, the Olympic Area Commanding Officer would be provided with a diagram of each portion of the Site 1 property, and this diagram would include access routes and any additional information that may facilitate police response to Site 1. Therefore, with the current adequate level of LAPD service, there would be no need for provision of new or physically altered police facilities and Site 1 development impacts related to response times would be less than significant.

Emergency Access

Emergency access to Site 1 would be provided by the existing street system, as currently occurs. Site 1 would be designed and constructed in accordance with County requirements to ensure proper emergency access. The Project would result in up to 10 peak hour impacts at seven intersections, depending upon

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36 Written Correspondence from Officer Christopher Gibson, Community Relations Division, Los Angeles Police Department, dated February 15, 2017. See Appendix 4.12-1 to this Draft EIR.
the phase of Project completion. Increases in traffic would not greatly affect police vehicles for the reasons discussed under Response Times, above. Therefore, as traffic impacts would not result in the need for expanded, consolidated, or relocated police facilities during operation of Site 1, impacts would be less than significant.

**Site 2**

**Construction**

Construction sites can be sources of attracting nuisances, providing hazards, and inviting theft and vandalism. The construction impacts for Site 2 would be less than significant for the reasons described under Site 1, above. Therefore, construction impacts as they relate to increased demand for police services during construction of the Project would be less than significant.

Traffic generated by construction workers and trucks would occur primarily during off-peak hours. Emergency access would be maintained to Site 2 during construction through marked emergency access points approved by the LAPD, and the Project would implement a CSTMP. Therefore, as traffic impacts (as they relate to response times) would not result in the need for expanded, consolidated, or relocated police facilities during construction on Site 2 impacts would be less than significant.

**Operation**

The operational impacts for Site 2 would be less than significant for the reasons described under Site 1, above. Therefore, with implementation of these design features and the current adequate level of LAPD service, there would be no need for provision of new or physically altered police facilities and Site 2 development would result in a less-than-significant operational impact on police protection services.

**Officer-to-Population Ratio**

Implementation of the development on Site 2 would result in an increase of residents and site visitors within the Site, thereby potentially generating a potential increase in the number of service calls from Site 2. Site 2 development involves the construction of a variety of uses including 246 residential units. As discussed in Section 4.11 (Population, Housing, and Employment) of this EIR, the Project would be expected to generate 618 new residents and operation of the Project would generate approximately 30 new employees on Site 2. Since the current officer to population ratio within the Olympic Community Station service area is one officer per approximately 851 residents, it is assumed that the addition of 618 new residents on Site 2 could create the demand for additional officers. With the addition of Site 2’s residential population, the resident/officer ratio in the West Bureau would be diminished. Specifically, the Project would increase the existing service population from 200,000 persons to 200,618 (200,000 + 618) persons. The officer-per-resident ratio would increase in the current level of one officer per approximately 851 residents up to one officer per approximately 854 residents (200,643 ÷ 235 officers = 854). This is only a slight increase and therefore, the development on Site 2 would not represent a significant change in the officer-per-resident ratio of the service area.

In addition, the development on Site 2 would incorporate crime prevention measures into project design as well as implement comprehensive safety and security measures, including adequate and strategically positioned functional and thematic lighting to enhance public safety. The measures are incorporated into the Project as Project Design Features, listed below. Visually obstructed and infrequently accessed “dead zones” would be limited and, where possible, security controlled to limit public access. The buildings and layout design of Site 2 would also include crime prevention features, such as nighttime security lighting
and a secure parking structure. These preventative and proactive security measures would decrease the amount of service calls the LAPD would receive. In sum, any minimal effect which the development of Site 2 would have on officer staffing levels would not cause service levels to decline within the Olympic Community station area, or require the need for provision of new or physically altered police facilities and impacts would be less than significant.

Using the existing officer to population ratio for the Olympic Community Station, the development on Site 2 could warrant the need for one additional officer to maintain the existing officer to population ratio in the Olympic Community Police Station service area, if the LAPD chooses to pursue additional staffing at this station. Since the Olympic Community Police Station currently accommodates approximately 250 personnel, there would be no need for the enlargement or the construction of a police station, the construction of which would cause significant environmental impacts. Therefore, impacts would be less than significant.

Additionally, on Site 2, the LAPD would review the Project design and provide guidance on design features that would minimize the opportunity for crime, which would minimize demand police protection services. Overall, no reduction in service levels, or provision of a new or expanded police station is anticipated to be needed as a result of the development on Site 2. The Project’s impact would be less than significant.

Response Times

The impacts related to response times for Site 2 would be less than significant for the reasons described under Site 1, above. Furthermore, upon completion of development on Site 2, the Olympic Area Commanding Officer would be provided with a diagram of each portion of the property, and this diagram would include access routes and any additional information that may facilitate police response to Site 2. Therefore, with the current adequate level of LAPD service, there would be no need for provision of new or physically altered police facilities and Project impacts related to response times would be less than significant.

Emergency Access

Emergency access to Site 2 would be provided by the existing street system, as currently occurs. Site 2 would be designed and constructed in accordance with LAMC requirements to ensure continued proper emergency access. The Project would result in up to 10 peak hour impacts at seven intersections, depending upon the phase of Project completion. Increases in traffic would not greatly affect police vehicles for the reasons discussed under Response Times, above. Therefore, as traffic impacts would not result in the need for expanded, consolidated, or relocated police facilities during operation of the Site 2 development impacts would be less than significant.

Site 3

Construction

Construction sites can be sources of attracting nuisances, providing hazards, and inviting theft and vandalism. The construction impacts for Site 3 would be less than significant for the reasons described under Site 1, above. Therefore, construction impacts as they relate to increased demand for police services during construction of the Project would be less than significant.

Traffic generated by construction workers and trucks would occur primarily during off-peak hours. Emergency access would be maintained to Site 3 during construction through marked emergency access
points approved by the LAPD, and the Project would implement a CSTMP. Therefore, as traffic impacts (as they relate to response times) would not result in the need for expanded, consolidated, or relocated police facilities during construction on Site 3 impacts would be less than significant.

**Operation**

The operational impacts for Site 3 would be less than significant for the reasons described under Site 1, above. Therefore, with implementation of these design features and the current adequate level of LAPD service, there would be no need for provision of new or physically altered police facilities and the Site 3 development would result in a less-than-significant operational impact on police protection services.

**Officer-to-Population Ratio**

Implementation of the development on Site 3 would result in an increase of residents, site visitors, and employees within the Site, thereby generating a potential increase in the number of service calls from Site 3. With the addition of Site 3’s residential population, the resident/officer ratio in the West Bureau would be reduced. The Project involves the construction of a variety of uses including 72 residential units. As discussed in Section 4.11 (Population, Housing, and Employment) of this EIR, the Project would be expected to generate 181 new residents and operation of the Project would generate approximately 46 new employees, which would result in a net decrease of approximately 66 employees on Site 3. Since the current officer to population ratio within the Olympic Community Station service area is one officer per approximately 851 residents, it is assumed that the addition of 181 new residents could create the demand for additional officers. Specifically, the Project would increase the existing service population from 200,000 persons to 200,181 (200,000 + 181 persons = 200,181 persons). The officer-per-resident ratio would increase in the current level of one officer per approximately 851 residents up to one officer per approximately 852 residents (200,181 ÷ 235 officers = 851.8). This is only a slight increase and therefore, the development on Site 3 would not represent a significant change in the officer-per-resident ratio of the service area.

In addition, the development on Site 3 would incorporate crime prevention measures into project design as well as implement comprehensive safety and security measures, including adequate and strategically positioned functional and thematic lighting to enhance public safety. The measures are incorporated into the Project as Project Design Features, listed below. Visually obstructed and infrequently accessed “dead zones” would be limited and, where possible, security controlled to limit public access. The buildings and layout design of Site 3 would also include crime prevention features, such as nighttime security lighting and a secure parking structure. These preventative and proactive security measures would decrease the amount of service calls the LAPD would receive. In sum, any minimal effect which the development of Site 3 would have on officer staffing levels would not cause service levels to decline within the Olympic Community station area, or require the need for provision of new or physically altered police facilities and impacts would be less than significant.

Using the existing officer to population ratio for the Olympic Community Station, the development on Site 3 could warrant the need for one additional officer to maintain the existing officer to population ratio in the Olympic Community Police Station service area, if the LAPD chooses to pursue additional staffing at this station. Since the Olympic Community Police Station currently accommodates approximately 250 personnel, there would be no need for the enlargement or the construction of a police station, the construction of which would cause significant environmental impacts. Therefore, impacts would be less than significant.
Response Times

The impacts related to response times for Site 3 would be less than significant for the reasons described under Site 1, above. Furthermore, upon completion of development on Site 3, the Olympic Area Commanding Officer would be provided with a diagram of each portion of the property, and this diagram would include access routes and any additional information that may facilitate police response to Site 3. Therefore, with the current adequate level of LAPD service, there would be no need for provision of new or physically altered police facilities and Project impacts related to response times would be less than significant.

Emergency Access

Emergency access to Site 3 would be provided by the existing street system, as currently occurs. Site 3 would be designed and constructed in accordance with County requirements to ensure continued proper emergency access. The Project would result in up to 10 peak hour impacts at seven intersections, depending upon the phase of Project completion. Increases in traffic would not greatly affect police vehicles for the reasons discussed under Response Times, above. Therefore, as traffic impacts would not result in the need for expanded, consolidated, or relocated police facilities during operation of the Site 3 development impacts would be less than significant.

CUMULATIVE IMPACTS

The geographic scope of the cumulative police protection analysis encompasses the service area for the LAPD in general, and the Olympic Community Police Station service area specifically. The Project, in combination with the construction and operation of the related projects located within the service area of the Olympic Community Station, would add residents and commercial land uses to the service area. It is anticipated that the additional population and commercial land uses would increase the demand for police protection services in the Olympic Community Police Station service area. Specifically, there would be increased demand for additional LAPD staffing, equipment, and facilities over time.

The LAPD determines the adequacy of police protection using the existing number of police officers in the Project’s police service area, the number of persons currently served in the area, the adequacy of the existing officer-to-population ratio in the area, and the number of persons that the Project would introduce to the area, within the context of crime rates, the types of crime, and the geographic distribution of crimes within a given police station service area. LAPD works with developers of projects to minimize demand for police services through review and coordination of project design, provision of adequate light, and on-site security measures, as warranted. The related projects are expected to have access to the expertise of the LAPD to benefit their design and operational planning, and each of the related projects would be subject to LAPD review of site plans, and security measures. Through this process, cumulative demand for police services within the Olympic Station area would be managed, and the Project, in combination with related projects, would not result in a cumulatively considerable impact.

In addition to the capabilities of the Olympic Station to serve the Project Sites and surrounding areas, including the related projects, growth in residential population and development throughout the City could increase demand for LAPD staffing, equipment, and facilities Citywide. These demands are met by LAPD through the allocation of available resources by LAPD management to meet varying needs throughout the LAPD’s Bureaus and Community Police Stations, as well as through the allocation of City resources between LAPD and other City departments, which is accomplished through the City’s annual programming and budgeting processes. Through implementation of these existing management and
regulatory processes, the cumulative demand for police protection is identified and addressed to the satisfaction of the City’s elected leadership and, thus, the Project, in combination with growth in demand for police protection services would not require the addition of a new police station or expansion, or consolidation or relocation of an existing facility to maintain service. Further, the Project impact analysis determined the impact on police protection would be less than significant not result in the need for expanded, consolidated, or relocated police facilities; thus, Project impacts would not be cumulatively considerable. Based on the above analysis, cumulative impacts related to police protection would be less than significant.

**PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS**

**Project Design Features**

The following PDFs will be incorporated into the Project and will work to address project impacts. These are not required mitigation but are inherent project components:

**PDF PS-2:** The Project shall incorporate the design guidelines outlined in the LAPD Design Out Crime Guidelines, which recommend using natural surveillance to maximize visibility, natural access control that restricts or encourages appropriate site and building access, and territorial reinforcement to define ownership and separate public and private space. Specifically, the Project would:

- Provide on-site security personnel whose duties shall include but not be limited to the following:
  - Monitoring entrances and exits;
  - Managing and monitoring fire/life/safety systems; and
  - Controlling and monitoring activities in the parking facilities.
- Install security industry standard security lighting at recommended locations including parking structures, pathway options, and curbside queuing areas;
- Install closed-circuit television at select locations including (but not limited to) entry and exit points and parking areas;
- Provide adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment;
- Provide lighting of building entries and open spaces to provide pedestrian orientation and to clearly identify a secure route between the parking area and access points;
- Design public spaces to be easily patrolled and accessed by safety personnel;
- Design entrances to, and exits from the building, to be open and in view of surrounding sites; and
- Limit visually obstructed and infrequently accessed “dead zones.”

**PDF PS-3:** Prior to the issuance of a certificate of occupancy for each construction phase and ongoing during operations, the Developer shall develop an Emergency Procedures Plan to address emergency concerns and practices. The Plan will be reviewed by the County for Sites 1 and 3, and by LAPD for Site 2. The County shall share the Plan for Sites 1 and 3 with LAPD.

**Regulatory Requirements**

No specific Regulatory Requirements are relevant to police services.
4.12 Public Services

MITIGATION MEASURES

No significant impacts related to police have been identified; therefore, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Construction and operational impacts related to police protection would be less than significant.

SCHOOLS

INTRODUCTION

This subsection describes the impacts of the Project on school services in the Project area, which are provided by the Los Angeles Unified School District (“LAUSD”) in this area of the City of Los Angeles. This section utilizes information from the following resources: the LAUSD website, School Facilities Needs Analysis 2014 LAUSD, the Employment Development Department website, and written correspondence with Rena Perez, Director of Master Planning & Demographics of the LAUSD (Appendix 4.12-1 to the Draft EIR).

ENVIRONMENTAL SETTING

Existing Public Schools

The LAUSD provides public education services for the residents of Los Angeles. The LAUSD jurisdiction encompasses an area of 720 square miles, serves approximately 640,000 students, and operates over 900 schools and 187 public charter schools. The LAUSD is divided into six local districts and all three Project Sites are located within Central District. The Project Sites are located in an Elementary, Middle, and High School attendance choice/option area.

LAUSD schools that would serve the Project Sites are the following: UCLA Community School, New Open World, Academy, and the Ambassador School-Global Education. Table 4.12-1 (LAUSD School Capacity and Enrollment) lists the location, enrollment capacities, 2015 to 2016 enrollments, and number of students above or below capacity for the schools. As shown in Table 4.12-1, the three schools serving the area are operating under capacity.

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38 Letter Correspondence with Rena Perez, Director, Master Planning and Demographics, LAUSD, March 2, 2017.
### Table 4.12-1

#### 2015-2016 LAUSD School Capacity and Enrollment

<table>
<thead>
<tr>
<th>School Type (Grade)</th>
<th>School Name</th>
<th>Location</th>
<th>Capacity</th>
<th>2015-2016 Resident Enrollment</th>
<th>(-)Under / (+)Over Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community School (Grades K-12)</td>
<td>UCLA Community School</td>
<td>700 S. Mariposa Avenue</td>
<td>4,591</td>
<td>4,495</td>
<td>-96</td>
</tr>
<tr>
<td>Community School (Grades K-12)</td>
<td>New Open World Academy</td>
<td>3201 W. 8th Street, Los Angeles, CA</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Community School (Grades K-12)</td>
<td>Ambassador School - Global Education</td>
<td>701 S. Catalina Street</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Source: Written correspondence with Rena Perez, Director of Master Planning & Demographics, LAUSD, March 2 2017.*

### Regulatory Framework

**Federal**

No federal regulations apply to the Project.

**State**

**Open Enrollment Policy**

Pursuant to Assembly Bill (“AB”) 149 and AB 2071, the State of California mandates an open enrollment 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. Each individual school is assessed based on the principal’s knowledge of new housing and other demographic trends in the attendance area. Open enrollment seats are granted through an application process that is completed before the school year begins. Students living in a particular school’s attendance area are not displaced by a student requesting an open enrollment transfer to that school.39

**School Facilities Fees**

Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan supports the school district’s levy of the fees authorized by California Education Code Section 17620.40

The Leroy F. Greene School Facilities Act of 1998 (“SB 50”) made amendments to existing State law governing school fees. In particular, SB 50 amended prior Government Code Section 65995(a) to prohibit State or local agencies from imposing school impact mitigation fees, dedications, or other requirements in excess of those provided in the statute in connection with “any legislative or adjudicative act...by any State or local agency involving...the planning, use, or development of real property....” The legislation also amended Government Code Section 65996(b) to prohibit local agencies from using the inadequacy of

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school facilities as a basis for denying or conditioning approvals of any “legislative or adjudicative act [involving] the planning, use, or development real property.” Further, SB 50 established the base amount of allowable developer fees. These base amounts are commonly called “Level 1 fees” and are the same caps that were in place at the time SB 50 was enacted. Level 1 fees are subject to inflation adjustment every two years.

In certain circumstances, for residential construction, school district can impose fees that are higher than Level 1 fees. School districts can impose Level 2 fees, which are equal to 50 percent of land and construction costs if they: (1) prepare and adopt a school needs analysis for facilities; (2) are determined by the State Allocation Board to be eligible to impose these fees; and (3) meet at least two of the following four conditions:

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

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

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

Pursuant to California Government Code Section 65995.5-7, the LAUSD has Level 1 Fees on residential and commercial development at a rate of $3.39 per square foot of new residential construction and $0.55 per square foot of new commercial construction within the boundaries of the LAUSD. It should be noted that LAUSD last assessed a Level 2 Fee in 2012-2013, but is not currently eligible to assess Level 2 Fees due to excess facility capacity issues at the elementary level. Accordingly, project developer(s) are required to pay school fees to LAUSD to offset the impact of additional student enrollment at schools serving the project area.

As a governmental entity, the County is not subject to the requirements for payment of school fees on new development. Accordingly, proposed development on Sites 1 and 3 is not subject to school fees. Proposed development on Site 2 would be subject to payment of school fees.

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41 School Works, News Release: Level 1 Rate Increased By 1.05 Percent at SAM Meeting, January 27, 2016.
Local

County of Los Angeles

No County regulations apply to school facilities with regard to the Project.

City of Los Angeles

Los Angeles General Plan Framework Element

The General Plan Framework Element, Chapter 9 Infrastructure and Public Services, contains policies and objectives which address school services within the City. These policies and objectives ensure that there is adequate school service demand as the population grows by monitoring services and pursuing funding for additional schools and expansion of existing schools. Specifically, Goal 9N of the General Plan Framework Element establishes the primary goal that schools provide “a quality education for all of the City’s children, including those with special needs, and adequate school facilities to serve every neighborhood in the City so that students have an opportunity to attend school in their neighborhoods.” The applicable objectives and policies in the Framework regarding schools are:

- Objective 9.31: Work constructively with the Los Angeles Unified School District to monitor and forecast school service demand based upon actual and predicted growth.
  - Policy 9.31.1: Participate in the development of, and share demographic information about, population estimates.

- Objective 9.32: Work constructively with LAUSD to promote the siting and construction of adequate school facilities phased with growth.
  - Policy 9.32.1: Work with the Los Angeles Unified School District to ensure that school facilities and programs are expanded commensurate with the City's population growth and development.
  - Policy 9.32.3: Work with LAUSD to explore incentives and funding mechanisms to provide school facilities in areas where there is a deficiency in classroom seats.

- Objective 9.33: Maximize the use of local schools for community use and local open space and parks for school use.

ENVIRONMENTAL IMPACTS

Methodology

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

The potential for the proposed Project to result in impacts associated with schools is based on the CEQA significance thresholds specified by Appendix G of the State CEQA Guidelines, which are addressed in this section. The applicable significance threshold is listed below.

Threshold 4.12-3: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, or the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives of the school district?

An affirmative answer to this question would represent a significant impact.

Project Design Elements

The Project would include governmental offices, commercial retail, multi-family residential, community recreation center, and on-site parking. No specific design elements in regards to schools are included.

Impact Analysis

Threshold 4.12-3: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, or the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives of the school district?

Site 1

Construction

Construction traffic has the potential to interfere with pedestrian routes for the LAUSD schools that are in the Project area. Construction of Site 1 would include temporary lane and sidewalk closures on the east side of Vermont Avenue and the west side of Shatto Place. Construction staging and construction-related parking would primarily be confined to Site 1 and would not significantly interfere with school traffic.

The Developer would be required to develop and implement a construction traffic management plan that would include consideration of safe routes to schools, in accordance with PDF PS-1 above. The construction traffic management plan would identify potential interim construction impacts and routes as needed to ensure that safe routes to schools are maintained.

Operation

When complete, the new Site 1 office building would be designed to accommodate a maximum of 2,166 employees in 2023. As discussed in Section 4.11 (Population, Housing and Employment), the Site 1 and Site 2 employment components of the Project are linked, in that the majority of employees that will be located on Site 1 after Project completion would be relocated from existing County facilities on Site 2. Table 4.12-2 (Project Student Generation) shows the student generation that would be associated with the change in employment on Sites 1 and 2 under the Project. As shown, the net student generation associated with Sites 1 and 2 office development would be approximately 197 students (472 from Site 1...
### Table 4.12-2
#### Project Student Generation

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Size</th>
<th>Employees per Square Foot&lt;sup&gt;a&lt;/sup&gt;</th>
<th>Students per Employee&lt;sup&gt;a&lt;/sup&gt;</th>
<th>Total&lt;sup&gt;d&lt;/sup&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Existing Uses</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Site 1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>County Office (Occupied)</td>
<td>30,788 sf</td>
<td>93&lt;sup&gt;b&lt;/sup&gt;</td>
<td>0.2247</td>
<td>21</td>
</tr>
<tr>
<td>County Office (Vacant)</td>
<td>13,325 sf</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td><strong>Site 1 Subtotal Existing Students</strong></td>
<td></td>
<td></td>
<td></td>
<td>21</td>
</tr>
<tr>
<td>Site 2</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>County Office (Occupied)</td>
<td>154,793 sf</td>
<td>973&lt;sup&gt;b&lt;/sup&gt;</td>
<td>0.2247</td>
<td>219</td>
</tr>
<tr>
<td>County Office (Occupied)</td>
<td>52,000 sf</td>
<td>250&lt;sup&gt;b&lt;/sup&gt;</td>
<td>0.2247</td>
<td>56</td>
</tr>
<tr>
<td><strong>Site 2 Subtotal Existing Students</strong></td>
<td></td>
<td></td>
<td></td>
<td>275</td>
</tr>
<tr>
<td>Site 3</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Office</td>
<td>29,292 sf</td>
<td>112&lt;sup&gt;b&lt;/sup&gt;</td>
<td>0.2247</td>
<td>25</td>
</tr>
<tr>
<td><strong>Site 3 Subtotal Existing Students</strong></td>
<td></td>
<td></td>
<td></td>
<td>25</td>
</tr>
<tr>
<td><strong>Total Existing Students</strong></td>
<td></td>
<td></td>
<td></td>
<td>321</td>
</tr>
<tr>
<td><strong>Proposed Uses</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Site 1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Office</td>
<td>471,000 sf</td>
<td>2,166&lt;sup&gt;b&lt;/sup&gt;</td>
<td>0.2247</td>
<td>487</td>
</tr>
<tr>
<td>Retail</td>
<td>10,000 sf</td>
<td>2.71 employees/1,000 sf</td>
<td>0.2247</td>
<td>6</td>
</tr>
<tr>
<td><strong>Site 1 Subtotal of Proposed Student Generation</strong></td>
<td></td>
<td></td>
<td></td>
<td>493</td>
</tr>
<tr>
<td><strong>Site 1 &amp; Relocation of County Employees from Site 2 Existing Students</strong></td>
<td></td>
<td></td>
<td></td>
<td>296</td>
</tr>
<tr>
<td><strong>Site 1 Net Student Generation</strong></td>
<td></td>
<td></td>
<td></td>
<td>197</td>
</tr>
<tr>
<td>Site 2</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Apartments</td>
<td>256 units</td>
<td>N/A</td>
<td>0.7&lt;sup&gt;c&lt;/sup&gt;</td>
<td>179</td>
</tr>
<tr>
<td>Retail</td>
<td>7,500 sf</td>
<td>2.71 employees/1,000 sf</td>
<td>0.2247</td>
<td>5</td>
</tr>
<tr>
<td><strong>Site 2 Student Generation</strong></td>
<td></td>
<td></td>
<td></td>
<td>184</td>
</tr>
<tr>
<td>Site 3</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Senior Affordable Housing</td>
<td>72 units</td>
<td>N/A</td>
<td>N/A</td>
<td>--</td>
</tr>
<tr>
<td>Community Recreation Center</td>
<td>13,200 sf</td>
<td>2.71 employees/1,000 sf</td>
<td>0.2247</td>
<td>8</td>
</tr>
<tr>
<td><strong>Site 3 Subtotal of Proposed Student Generation</strong></td>
<td></td>
<td></td>
<td></td>
<td>8</td>
</tr>
<tr>
<td><strong>Site 3 Existing Students</strong></td>
<td></td>
<td></td>
<td></td>
<td>25</td>
</tr>
<tr>
<td><strong>Site 3 Net Student Generation</strong></td>
<td></td>
<td></td>
<td></td>
<td>(17)</td>
</tr>
<tr>
<td><strong>Subtotal Proposed Student Generation</strong></td>
<td></td>
<td></td>
<td></td>
<td>685</td>
</tr>
<tr>
<td><strong>Existing Student Generation</strong></td>
<td></td>
<td></td>
<td></td>
<td>321</td>
</tr>
<tr>
<td><strong>Total Net Increase in Student Generation</strong></td>
<td></td>
<td></td>
<td></td>
<td>364</td>
</tr>
</tbody>
</table>

**Note:** sf = square feet

<sup>a</sup> Los Angeles Unified School District, Residential Development School Fee Justification Study, March 2014.

<sup>b</sup> Employee counts provided by the Developer.

<sup>c</sup> Students per household.

<sup>d</sup> Rounded the numbers to whole numbers.


Office uses less, 275 associated with existing County employees on Site 2), as calculated using the LAUSD School Fee Justification Study. A State-mandated open enrollment policy enables students anywhere in LAUSD to apply to any regular, grade-appropriate LAUSD school with designated “open enrollment” seats. The number of open enrollment seats is determined annually. Each individual school is assessed based
on the principal's knowledge of new housing and other demographic trends in the attendance area. Open enrollment seats are granted through an application process that is completed before the school year begins. Students living in a particular school’s attendance area are not displaced by a student requesting an open enrollment transfer to that school.

While new employment opportunities would be created with the development on Site 1, most of the expected employees would be drawn from the existing County labor force in the immediate area and would not need to relocate. Therefore, it is likely that most of the students generated by the development on Site 1 would already be enrolled in LAUSD schools, or elsewhere, and would not transfer into LAUSD. Accordingly, the calculated student generation presented in this section would represent a conservative estimate.

The County is not subject to school fees. The projected level of student generation on Site 1 would exceed the available capacity of area schools as shown in Table 4.12-1. However, the low levels of student generation associated with the Project uses on Site 1, coupled with the fact that most of the employees on Site 1 would be County employees already working in the area, would represent a minimal potential increase in enrollment in LAUSD schools, and the impact on school services generated by Site 1 would be less than significant.

**Site 2**

**Construction**

Construction traffic has the potential to interfere with pedestrian routes for the LAUSD schools that are within the Project area. Construction of Site 2 would include temporary lane and sidewalk closures on the east side of Vermont Avenue and the north side of 6th Street. Construction staging and construction-related parking would primarily be confined to Site 2 and would not significantly interfere with school traffic.

The Developer would be required to develop and implement a construction traffic management plan that would include consideration of safe routes to schools, in accordance with PDF PS-1 above. The construction traffic management plan would identify potential interim construction impacts and routes as needed to ensure that safe routes to schools are maintained.

**Operation**

As shown in Table 4.12-2 (Project Student Generation), residential and retail uses on Site 2 would generate an increase of approximately 184 students. For a conservative analysis, it is assumed that all 184 new students generated by the new and reuse development on Site 2 would be new to the school district.

A State-mandated open enrollment policy enables students anywhere in LAUSD to apply to any regular, grade-appropriate LAUSD school with designated “open enrollment” seats. The number of open enrollment seats is determined annually. Each individual school is assessed based on the principal’s knowledge of new housing and other demographic trends in the attendance area. Open enrollment seats are granted through an application process that is completed before the school year begins. Students living in a particular school’s attendance area are not displaced by a student requesting an open enrollment transfer to that school. As previously discussed, the schools serving Site 2 are operating under capacity. Although the development of Site 2 could potentially result in these schools surpassing their capacity for students, pursuant to SB50, payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees, would,
by law, minimize the Project’s direct and indirect impacts on schools with regards to CEQA. Government Code Section 65997(b) states that:

A public agency may not, pursuant to Division 13 (commencing with Section 21000) of the Public Resources Code or Division 2 (commencing with Section 66410) of this code, deny approval of a project on the basis of the adequacy of school facilities.

Therefore, payment of the applicable school fees to LAUSD would offset the impact of additional student enrollment at schools serving the Project area. With payment of the applicable school fees per SB 50, impacts on the schools identified to serve the Project would be less than significant.

Site 3

Construction

Construction traffic has the potential to interfere with pedestrian routes for the LAUSD schools that are within the Project area. Construction of Site 3 would include temporary lane and sidewalk closures on the west side of Vermont Avenue. Construction staging and construction-related parking would primarily be confined to Site 3 and would not significantly interfere with school traffic.

The Developer would be required to develop and implement a construction traffic management plan that would include consideration of safe routes to schools, subject to LADOT approval. The construction traffic management plan would identify potential interim construction impacts and routes as needed to ensure that safe routes to schools are maintained.

Operation

Site 3 would be developed with senior affordable housing units, and a community recreation center. No student generation would be associated with this use. As shown in Table 4.12-2 (Project Student Generation), Site 3 would generate a net decrease of approximately 17 students. No impact on school services would result from the development of Site 3. As noted above, the County is not subject to school fees for new development.

CUMULATIVE IMPACTS

As previously discussed, pursuant to AB 149 and AB 2071, LAUSD has an open enrollment policy. The number of open enrollment seats is determined annually and, thereby, changes year to year. Thus, it cannot be determined, at the time of the preparation of this EIR, which schools in LAUSD will be available in the future for open enrollment. Therefore, for this EIR, the geographic scope of the cumulative school analysis is the service area of the local LAUSD schools that would serve the Project residents. The Project, in combination with the related and other future projects, would increase the cumulative demand for schools in LAUSD. As discussed previously, pursuant to SB 50 and California Government Code Section 65995, the Project and related projects would be required to pay development impact fees to the LAUSD Developer Fee office. Payment of these development fees would offset any potential cumulative impacts that could occur to LAUSD from development of the Project and related projects within the LAUSD service area. Therefore, the full payment of all applicable school fees would reduce potential cumulative impacts to schools and cumulative impacts would be less than significant.
PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

No specific Project Design Features are relevant to schools.

Regulatory Requirements

The following standards would be imposed by existing laws and regulations and would work to address Project impacts. These are not required mitigation but are inherent Project components.

RR PS-4: Development on Site 2 will be required to pay to the LAUSD the prevailing LAUSD fee. School fees exacted from residential and commercial uses would help fund necessary school service and facilities improvements to accommodate anticipated population and school enrollment within the LAUSD service area.

MITIGATION MEASURES

No significant impacts to schools have been identified; therefore, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Construction and operational impacts related to schools would be less than significant.

RECREATION

The reader is referred to section 4.13 of this Draft EIR, for a discussion related to the potential impacts of the Project on parks and recreation services in the Project area.

LIBRARIES

INTRODUCTION

This subsection describes the potential impacts of the Project on library services, which would be provided by the Los Angeles Public Library (“LAPL”) because of the location of the Project Sites in the City of Los Angeles. This section utilizes information from the following resources: the LAPL website, the Los Angeles Citywide General Plan Framework EIR, and written correspondence with Tom Jung, Management Analyst II of the LAPL (Appendix 4.12-1 to the Draft EIR).

ENVIRONMENTAL SETTING

Library Services

The LAPL provides library services throughout the City, which includes the Central Library, eight regional branch libraries, and 72 community branches. According to the L.A. CEQA Thresholds Guide (2006), approximately six million books and other materials comprise the LAPL collection. According to the

Citywide General Plan Framework EIR, Chapter 9 (Infrastructure and Public Services), libraries in the City are mandated to include certain facility sizes based on service population and have a maximum service radius of two miles. The library that serves the Project Sites is the Felipe de Neve Branch Library located at 2820 W. 6th Street. Other libraries that may serve the Project include the Memorial Branch Library located at 4625 W. Olympic Boulevard and the Pico Union Branch Library located at 1030 S. Alvarado Street. The Goldwyn-Hollywood, Durant, and Fremont Libraries include resources for children, Spanish language speakers, and teenagers, as well as free access to computer workstations.

The Felipe de Neve Branch Library would serve the Project. It is located at 2820 W. 6th Street, approximately 1.2 miles east of the Project Sites. At 9,273 square feet, the Felipe de Neve Branch Library does not meet the standard of 14,500 square feet for a service population in excess of 45,000. The Felipe de Neve Branch Library is open six days and four nights a week. Currently, the Felipe de Neve Branch Library houses approximately 37,598 volumes and has nine staff positions. It presently has resources for children, teens, adults, and Spanish speakers. The Felipe de Neve Branch Library also provides free wireless Internet access and wireless printing. Similar to every branch of the LAPL, the Felipe de Neve Branch Library offers free use of computer workstations that provide access to the LAPL’s information network. These workstations also provide Internet access, the ability to search the LAPL online catalog, subscription databases, word processing and language learning tools, access to an historic document and photograph collection, and access to specially designed websites for children, teens, and Spanish speakers.

Regulatory Framework

Federal
No federal regulations apply to the Project.

State
No State regulations apply to the Project.

Local

County of Los Angeles
No County regulations are applicable to the Project.

City of Los Angeles
The LAPL Branch Facilities Plan (the “LAPL Plan”), adopted in 1988, sets standards for site selection of libraries and identified a list of projects in which existing branch libraries are to be renovated or new facilities constructed in order to bring library resources to the residents of the City in accordance with the standards in the LAPL Plan. The goals of the LAPL Plan were implemented with money received by two

43 City of Los Angeles, Los Angeles Citywide General Plan Framework EIR, Figure L-1, page 2.13-8, January 1995.
44 Letter correspondence with Tom Jung, Management Analyst II, LAPL, February 27, 2017.
45 Letter correspondence with Tom Jung, Management Analyst II, LAPL, February 27, 2017.
46 Letter correspondence with Tom Jung, Management Analyst II, LAPL, February 27, 2017.
47 Los Angeles Public Library, Los Angeles Public Library Strategic Plan 2015-2020.
bond programs: Phase I of the LAPL Plan was implemented with funds from the 1989 Bond Program and Phase II by the 1998 Bond Program. Under the two bond programs, 64 library facilities have been renovated or built.48 All of the projects identified under the Plan were completed by October, 2008.49 At present, the Plan is going through a process of revision in which the list of projects for the LAPL through the year 2030 will be updated.

The City’s library policy is guided by the LAPL Plan, which is composed of two elements: (1) the Criteria for New Libraries; and (2) the Proposed Project List. The Board of Library Commissioners adopted a fully revised Plan on February 8, 2007. This LAPL Plan includes guidelines for the construction of branch libraries and specifies standards in defining facility size. According to the current Plan, service criteria are based on floor area required to serve varying amounts of residential population. Current LAPL branch building size standards are presented in Table 4.12-3 (LAPL Branch Facilities Site Selection Criteria).

<table>
<thead>
<tr>
<th>Population Served</th>
<th>Size of Facility (square feet)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Above 45,000</td>
<td>14,500</td>
</tr>
<tr>
<td>Below 45,000</td>
<td>12,500</td>
</tr>
<tr>
<td>Regional Branch</td>
<td>20,000</td>
</tr>
</tbody>
</table>

Source: Letter correspondence with Tom Jung, Management Analyst II, LAPL, February 27, 2017.

Additionally, the General Plan Framework EIR recommends use of the State of California standards of 0.5 square feet of facility space per capita and two volumes of collection per resident.50

The LAPL Strategic Plan 2015-2020 (the “LAPL Strategic Plan”), adopted in 2015, is the most current Plan that sets goals for increasing the number of people who use library services, increase the number of library card holders, and actively promote and market programs and services to increase overall engagement with the library.51 With the passage of Measure L, the LAPL is offering enhanced programs, increased collections, additional technology, an expanded digital presence and increased opportunities for connection within and between communities. Measure L, approved by City voters on March 8, 2011, amends the City Charter to incrementally increase the amount the City is required to dedicate annually from its General Fund to LAPL to an amount equal to 0.03 percent of the assessed value of all property in the City, and incrementally increase LAPL’s responsibility for its direct and indirect costs until it pays for all of its costs. The LAPL Strategic Plan is comprised of the following six goals to achieve the increased use of local libraries:

- **Goal 1**: Cultivate and Inspire Young Readers;
- **Goal 2**: Nurture Student Success;
- **Goal 3**: Champion Literacy and Lifelong Learning;
- **Goal 4**: Contribute to L.A.’s Economic Growth;

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48 Ibid.
49 Ibid.
51 Los Angeles Public Library, Los Angeles Public Library Strategic Plan 2015-2020.
• **Goal 5**: Stimulate the Imagination; and

• **Goal 6**: Strengthen Community Connections and Celebrate L.A.

ENVIRONMENTAL IMPACTS

Methodology

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

Thresholds of Significance

The potential for the proposed Project to result in impacts associated with library services is based on the CEQA significance thresholds specified by Appendix G of the State CEQA Guidelines, which are addressed in this section. The applicable significance threshold is listed below.

**Threshold 4.12-4:** Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, or the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library services?

An affirmative answer to this question would represent a significant impact.

Project Design Elements

The Project would include governmental offices, commercial retail, multi-family residential, community recreation center, and on-site parking. No specific design elements in regards to libraries are included.

Impact Analysis

**Threshold 4.12-4:** Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, or the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library services?

**Site 1**

*Construction*

The Project would result in a temporary increase of construction workers on Site 1. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, though, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, Project-related construction workers would not result
in a notable increase in resident population or a corresponding demand for library services in the vicinity of Site 1.

In addition, it is unlikely that construction workers would visit Project area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, impacts related to library facilities during Site 1 construction would be less than significant.

**Operation**

The Project would be served by the Felipe de Neve Branch Library located at 2820 W. 6th Street. Measuring 9,273 square feet in size, the Felipe de Neve Branch Library does not meet the proposed community branch building size criteria defining a regional branch as up to 14,500 square feet in size.\(^{52}\) As discussed in Section 4.11 (Population, Housing, and Employment), of this EIR, development on Site 1 would generate approximately 907 additional (net) County office and retail employees and would not result in the generation of permanent residents. In order to provide the capability to meet the County’s future needs, the new Site 1 office building would be designed to accommodate future growth, to a maximum of 2,166 employees, between 2021 and 2023. While new employment opportunities would be created with the development on Site 1, the majority of employees are coming from Site 2 and from other county locations in the immediate area, these are not new jobs but existing jobs, and would not require the need to relocate. In addition, the type of jobs associated with office developments are typically filled by persons already residing in the vicinity of or within commuting distance of the workplace and not likely to relocate their households due to such employment opportunities. Further, the current labor force would already be users of the LAPL system to the extent that local libraries are patronized during the work day, and not new to the system. In addition, during non-work hours, employees would use their local libraries. As a result, the increase in employees from the development on Site 1 would not generate the need for new or expanded facilities and would have a less than significant impact on library services.

**Site 2**

**Construction**

The Project would result in a temporary increase of construction workers on Site 2. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, though, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, Project-related construction workers would not result in a notable increase in resident population or a corresponding demand for library services in the vicinity of Site 2.

In addition, it is unlikely that construction workers would visit Project area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is

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\(^{52}\) Letter correspondence with Tom Jung, Management Analyst II, LAPL, February 27, 2017.
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. As such, impacts related to library facilities during Site 2 construction would be less than significant.

**Operation**

The Project would be served by the Felpe de Neve Branch Library located at 2820 W. 6th Street. Measuring 9,273 square feet in size, the Felpe de Neve Branch Library does not meet the proposed community branch building size criteria defining a regional branch as up to 14,500 square feet in size. As discussed in Section 4.11 (Population, Housing, and Employment), of this EIR, development on Site 2 would be expected to generate 618 new residents. These new residents would be within the growth forecast for the City. However, according to correspondence from LAPL, the Felpe de Neve Branch Library is not adequately meeting the current demand and completion of the Project could create an impact on library services. Under Measure L, library funding is now mandated under the City Charter to be funded from property taxes, including those assessed against the residential and retail components of the Project on Site 2, which would increase with the new development and would be used for additional staff, books, computers, and other library materials. Libraries are required to pay for their own direct and indirect costs as of July 2014 with this source of revenue. To the extent any new or expanded facilities are determined to be required, LAPL would develop these facilities contingent upon the availability of land and resources to provide library facilities. In addition, any new library facilities would typically generate less than significant impacts because they would be expansions of existing facilities or new buildings in already urban areas that are not environmentally sensitive. However, in the unlikely event a new library facility may have significant effects, any such action on the part of LAPL would be a discretionary action that would be subject to project level CEQA review. As a result, the increase in residential population associated with the Project would represent a less than significant impact on libraries.

**Site 3**

**Construction**

The Project would result in a temporary increase of construction workers on Site 3. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, though, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, Project-related construction workers would not result in a notable increase in resident population or a corresponding demand for library services in the vicinity of Site 3.

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

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53 Letter correspondence with Tom Jung, Management Analyst II, LAPL, February 27, 2017.
54 Ibid.
the libraries by construction workers is anticipated to be negligible. As such, impacts related to library facilities during Site 3 construction would be less than significant.

**Operation**

The Project would be served by the Felipe de Neve Branch Library located at 2820 W. 6th Street. Measuring 9,273 square feet in size, the Felipe de Neve Branch Library does not meet the proposed community branch building size criteria defining a regional branch as up to 14,500 square feet in size. As discussed in Section 4.11 (Population, Housing, and Employment), of this EIR, development on Site 3 would be expected to generate 181 new residents. The addition of these new residents would be within the growth projection for the City and less than significant. However, according to correspondence from LAPL, the Felipe de Neve Branch Library is not adequately meeting the current demand and completion of the Project would create an impact on library services. Under Measure L, library funding is now mandated under the City Charter to be funded from property taxes, including those assessed against the residential component of the Project on Site 3, which would increase with the new development and would be used for additional staff, books, computers, and other library materials. Libraries are required to pay for their own direct and indirect costs as of July 2014 with this source of revenue. To the extent any new or expanded facilities are determined to be required, LAPL would develop these facilities contingent upon the availability of land and resources to provide library facilities. In addition, any new library facilities would typically generate less than significant impacts because they would be expansions of existing facilities or new buildings in already urban areas that are not environmentally sensitive. However, in the unlikely event a new library facility may have significant effects, any such action on the part of LAPL would be a discretionary action that would be subject to project level CEQA review. As a result, the increase in residential population associated with the Project would represent a less than significant impact on libraries.

**CUMULATIVE IMPACTS**

Implementation of the Project, in combination with the 115 related projects identified in Section 3.0 (Project Description and Environmental Setting), would increase demand for library services in the Project vicinity. However, the geographic scope for the cumulative impact analysis is the extent of the related projects that would be served by Felipe de Neve Branch Library. Similar to the Project, each related project would generate revenues to the LAPL in the form of property taxes that could be applied toward the provision of new library facilities, staffing, and materials for any one of the libraries serving the Project area, as deemed appropriate. These revenues would help offset the increase in demand for library services as a result of the Project and the related projects. Under Measure L, library funding is now mandated under the City Charter to be funded from property taxes, including those assessed against the Project and related projects, which would increase with the new development and would be used for additional staff, books, computers, and other library materials. Libraries are required to pay for their own direct and indirect costs as of July 2014 with this source of revenue. This dedicated funding source is intended to address cumulative demand for library services throughout the City. To the extent any new or expanded facilities are determined to be required to address cumulative demand for library services,

55 Letter correspondence with Tom Jung, Management Analyst II, LAPL, February 27, 2017.
56 Ibid.
LAPL would develop these facilities contingent upon the availability of land and resources to provide library facilities. In addition, any new library facilities would typically generate less than significant impacts because they would be expansions of existing facilities or new buildings in already urban areas that are not environmentally sensitive. However, in the unlikely event a new library facility may have significant effects any such action on the part of LAPL would be a discretionary action that would be subject to CEQA review.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

No specific Project Design Features are proposed with respect to library facilities.

Regulatory Requirements

No specific regulatory requirements are applicable with respect to library facilities.

MITIGATION MEASURES

No significant impacts to libraries have been identified, and no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts on library services would be less than significant.