IV. ENVIRONMENTAL IMPACT ANALYSIS

K. PUBLIC SERVICES

1. FIRE

ENVIRONMENTAL SETTING

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

The LAFD has 3,586 uniformed personnel and 353 non-uniformed support staff. Their services include fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education and community service. A professionally trained staff of 1,104 firefighters (including 242 paramedic-trained personnel) is on duty at all times at 106 neighborhood fire stations located across the LAFD’s 471-square-mile jurisdiction.

The proposed project would primarily be served by Fire Station No. 19. However, Fire Station Nos. 37 and 59 are also in the vicinity of the project site and would also be available for fire protection services (locations shown in Figure IV.K-1, Fire Station Location Map).

Fire Station No. 19 is located at 12229 West Sunset Boulevard approximately 0.7 mile northwest of the project site and is staffed with six members at all times. Four members are assigned to the Fire Engine and two members are assigned to the Paramedic Rescue Ambulance.

Fire Station No. 37 is located at 1090 S. Veteran Avenue approximately 1.9 miles east of the project site and is staffed with 14 members at all times: Six members are assigned to the Light Force (Truck and Engine), four members are assigned to the Fire Engine, two members are assigned to the Paramedic Rescue Ambulance, and two members are assigned to the Battalion Command Team.

Fire Station No. 59 is located at 11505 West Olympic Boulevard approximately 2.4 miles southwest of the project site and is staffed with seven members at all times: Four members are assigned to the Fire

2 William Wells, Captain II-Paramedic, Los Angeles Fire Department, response to service letter request, May 28, 2009
Engine, two members are assigned to the Paramedic Rescue Ambulance, and one member is the EMS Battalion Captain.

**Fire Flows**

The adequacy of fire protection for a given area is based on required fire flow, response time from existing fire stations, and the LAFD’s judgment of assessing the needs in a given area. The required fire flow is closely related to the type and size of land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. 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 any instance, a minimum residual water pressure of 20 pounds per square inch (psi) is to remain in the water system while the required gpm is flowing.³

The City of Los Angeles Department of Water and Power (LADWP) currently provides fire flow for the proposed project. Fire flows are supplied by the same water mains as the domestic water system, including the lines located in local streets and major roadways. Refer to section IV.M-2, Water, for a complete discussion of water service infrastructure. Fire hydrants and building fire water service systems connect directly to local water mains. The fire service system for each building, however, has water lines, vaults, etc., for fire water flows that are separate from their respective domestic water systems.

**Response Distance**

Response time relates to the physical linear travel distance (i.e., the number of miles between a fire station and a specific location) and the Fire Department’s ability to successfully navigate the given roadway network. Roadway congestion, intersection level of service (LOS), weather conditions, and construction traffic along the response route can affect the response distance in terms of travel time.

The Fire Code specifies maximum response distances allowed between specific locations and Engine/Truck companies, based upon land use and fire flow requirements. When response distances exceed these requirements, all structures must be equipped with automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems, etc.). Fire flow and response distance requirements are summarized in Table IV.K-1.

³ *Los Angeles Municipal Code, Los Angeles Fire Code, Section 57.09.06.*
Figure IV.K-1
Fire Station Location Map
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Table IV.K-1
Fire Flow and Response Distance Requirements

<table>
<thead>
<tr>
<th>Type of Land Development</th>
<th>Fire Flow</th>
<th>Response Distance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Low Density Residential</td>
<td>2,000 gpm from three adjacent fire hydrants flowing simultaneously</td>
<td>1-1/2 mile</td>
</tr>
<tr>
<td>High Density Residential and Neighborhood Commercial</td>
<td>4,000 gpm from four adjacent fire hydrants flowing simultaneously</td>
<td>1-1/2 mile</td>
</tr>
<tr>
<td>Commercial</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Industrial and Commercial</td>
<td>6,000 to 9,000 gpm from four to six fire hydrants flowing simultaneously</td>
<td>1 mile</td>
</tr>
<tr>
<td>High Density Industrial and Commercial (Principal Business Districts or Centers)</td>
<td>12,000 gpm available to any block (where local conditions indicate that consideration must be given to simultaneous fires, and additional 2,000 to 8,000 gpm will be required).</td>
<td>3/4 mile 1 mile</td>
</tr>
</tbody>
</table>

Notes: gpm = gallons per minute; Co. = company

The LAFD considers fire protection services for a project adequate if the project is within the maximum response distance for the land use proposed. Pursuant to Section 57.09.07A of the LAMC, the maximum response distance between residential land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles. For a commercial land use, the distance is one mile for an engine company and 1.5 miles for a truck company. If either of these distances is exceeded, all structures located in the applicable residential or commercial area would be required to install automatic fire sprinkler systems.

The required fire flow is closely related to the type and size of the land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. Section 57.09.06 of the LAMC states that 4,000 gpm from four adjacent fire hydrants flowing simultaneously is required for neighborhood commercial land uses and 2,000 gpm from three adjacent hydrants flowing simultaneously is required for low density residential land uses. In either case, a minimum residual water pressure of 20 pounds per square inch is to remain in the system with the required gallons per minute flowing. The fire flow for the proposed project would be determined by LAFD during required site plan review process. In addition, the number of public fire hydrants required for the proposed project as well as the potential need for private fire hydrants would be determined during the site review process. The site and existing structures are served with fire flows and hydrants. Given that land uses for the proposed project are similar to the existing on-site uses which must conform to fire flow and hydrant requirements, fire flow and hydrants would be able to serve the proposed project without major disruption.
ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with guidance provided in Appendix G to the State CEQA Guidelines, a significant impact would occur if a project would result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or need for new or physically altered fire protection 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 fire department.

Furthermore, as set forth in the City of Los Angeles L.A. CEQA Thresholds Guide, a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service.

Adequate service is based on response distance, which determines response times (along with varying traffic congestion). The LAFD requirements are described in Table IV.K-1.

Project Impacts

Construction

Construction of the proposed project would increase the potential for accidental on-site fires from such sources as the operation of mechanical equipment, use of flammable construction materials, and carelessly discarded cigarettes. There is also the possibility that construction workers could get injured and need an EMT, thus requiring the services of the LAFD. In most cases, implementation of “good housekeeping” procedures by the construction contractors and work crews would minimize these hazards. Good housekeeping procedures that would be implemented during construction of the proposed project include: the maintenance of mechanical equipment in good operating condition; careful storage of flammable materials in appropriate containers; and the immediate and complete cleanup of spills of flammable materials when they occur. Although the possibility of fires and injuries can never be fully negated, these best practices would reduce the quantity and severity of fires and injuries.

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 by partial lane closures during street improvements and utility installations, if required. These impacts, while potentially adverse, are considered to be less than significant for the following reasons:

- Construction impacts are temporary in nature and do not cause lasting effects; and
- Partial lane closures would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the project site, flagmen would be used to facilitate the traffic flow until construction is complete.
• Construction of the proposed project is not expected to cause significant congestion at the local study intersections (see Section IV.L, Transportation and Traffic, for further discussion). Although minor traffic delays may occur during construction, particularly during the construction of utilities and street improvements, impacts to fire response times would be minimal and temporary.

Project construction would not be expected to tax fire fighting and emergency services to the extent that there would be a need for new or expanded fire facilities, in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. Therefore, there would be no need to construct new facilities that could cause significant environmental impacts and construction-related impacts to fire protection services would be less than significant.

**Operation**

**Response Distance**

The project site is within 0.7 miles of a LAFD fire station housing a Fire Engine Company. In addition, the project site is within 1.9 miles of a second LAFD fire station and 2.4 miles of a third fire station. The response distance from these fire stations meets LAMC and LAFD recommendations. Therefore, the response distance would be considered adequate and impacts with respect to response distance would be less than significant.

**Response Time**

The response times to the project site is estimated at 4.2 minutes from Fire Station No. 19, 6.2 minutes from Fire Station No. 37, and 7.2 minutes from Fire Station No. 59. These response times meet the desired response distance standards of the LAFD.4

**Emergency Access**

The proposed project would not involve any other activities during its operational phase that could impede public access or travel upon public rights-of-way along San Vicente Boulevard or Saltair Avenue or that would interfere with an adopted emergency response or evacuation plan. Thus, project implementation would not require the construction or expansion of fire stations or other fire protection facilities. Therefore, impacts would be less than significant.

Fire Station No. 19’s direct route to the project site would be south along Kenter Avenue, which becomes Bundy Drive and left on San Vicente Boulevard. Fire Station No. 37’s direct route to the project site would be south on Veteran Avenue, right on Wilshire Boulevard, and right on San Vicente Boulevard.

4 William Wells, Captain II-Paramedic, Los Angeles Fire Department, response to service letter request, May 28, 2009
Fire Station No. 59’s direct route to the project site would be west on Olympic Boulevard and either right on Barrington Avenue or Bundy Drive north to San Vicente Boulevard.

Fire Flows

As determined by the LAFD, the overall fire flow requirement for the proposed project is 4,000 gpm from four fire hydrants flowing simultaneously with a 20 PSI minimum residual pressure. Water pressure and availability at the project site are sufficient to meet the existing LAFD’s fire flow requirements because the site contains existing occupied uses that must conform to fire flow requirements. Further, all structures would be within 300 feet of an approved fire hydrant. For a complete discussion of the proposed project’s provision of water service for fire flows and domestic purposes, refer to Section IV.M.2 (Water Supply).

The Water Operations Division of the LADWP would perform a fire flow study at the time of permit review in order to ascertain whether further water system or site-specific improvements would be necessary. Hydrants, water lines, and water tanks would be installed per Fire Code requirements and would be based upon the specific land uses of the proposed project. As the proposed project would be similar in scale, size, and land use to the existing operational uses, it is assumed that hydrants and water lines would continue to adequately serve the proposed project. Therefore, with respect to fire flows, fire protection would be adequate.

Conclusion

The proposed project would comply with all applicable provisions of the City’s Fire and Building Codes, including, but not limited to water line improvements and connections, as required, to ensure that fire flows and emergency access would be adequate to serve the project. The proposed development would include separate access points for entry and exit, with internal driveways that would allow access to all of the on-site parking facilities. Both access points would be located on San Vicente Boulevard and each driveway would consist of one-way one-car lanes (fire lanes, where required, shall be a minimum of 20 feet in width). Furthermore, project construction and staging would be confined to the project site and, therefore, would not interfere with LAFD access to surrounding neighborhoods. The proposed project would not create adverse impacts associated with fire protection services. According to the LAFD response letter, the existing staffing levels, equipment inventories, and fire station facility space are currently adequate. Therefore, a less than significant impact would occur.

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6 William Wells, Captain II-Paramedic, Los Angeles Fire Department, response to service letter request, May 28, 2009.
CUMULATIVE IMPACTS

The proposed project, in combination with the construction and operation of the 32 related projects (see Table III-1 in Environmental Setting for a listing of related projects) would increase the demand for fire protection services in the project area. Specifically, there would be increased demands for additional LAFD staffing, equipment, and facilities over time. This need would likely be funded via existing mechanisms (i.e., property taxes, government funding), to which the proposed project and related projects would contribute.

Related Project Nos. 25-32 would be located in the City of Santa Monica and served by the Santa Monica Fire Department (SMFD). Only the related projects in the City of Los Angeles would be expected to cumulatively impact the service of the LAFD. The proposed project would not impact the SMFD.

Similar to the proposed project, each of the related projects would be individually subject to LAFD review and would be required to comply with all applicable construction-related and operational fire safety requirements of the LAFD and the City of Los Angeles in order to adequately mitigate fire protection impacts. For example, all related projects would be required to assure that LAFD access remains clear during all demolition and construction activities. In addition, for any residential related project more than 1.5 miles from the nearest LA FD Engine or Truck Company, or for any commercial related project more than one mile from an LAFD Engine Company or 1.5 miles from an LAFD Truck Company, LAMC Section 57.09.07 would require the installation of automatic fire sprinkler systems, in order to compensate for the additional response distance. Any LAFD or LADWP-required upgrades to the water distribution systems serving the related projects would be addressed for each individual related project in conjunction with their project approvals. Each of the related projects is also individually subject to LAFD review and would be required to comply with all applicable fire safety requirements, including hydrant and access improvements, if necessary, in order to adequately mitigate fire protection impacts. If any of the related projects would create demands on fire protection staffing, equipment, or facilities such that a new station would be required, potential environmental impacts would be addressed in conjunction with the environmental review for that project.

At present there is no need for, or plan to build, a new fire station. Depending on the facility and staffing decisions made by the City of Los Angeles, new or physically altered fire protection facilities may be authorized at some time in the future to meet future demands. It is likely that over time a new or expanded fire station would be needed to accommodate the additional personnel hired as a result of cumulative growth. However, it is anticipated that any new or expanded fire station would be subject to environmental review in accordance with CEQA and any potential environmental impacts would be addressed at that time.

Furthermore, any new or expanded fire station would be funded via existing mechanisms (i.e., sales taxes, government funding) to which the proposed project and related projects would contribute. In addition,
similar to the proposed project, each of the related projects would be individually subject to LAFD review, and would be required to comply with all applicable safety requirements of the LAFD and the City of Los Angeles in order to adequately address fire protection service demands. Therefore, the proposed project’s and related project’s cumulative impact would be less than significant.

MITIGATION MEASURES

No mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts with respect to fire protection would be less than significant.

Cumulative impacts would be less than significant.
ENVIRONMENTAL SETTING

The Los Angeles Police Department (LAPD) is the local law enforcement agency responsible for providing police services to the project site and immediate project vicinity. The LAPD is divided into four Police Station Bureaus: Central Bureau, South Bureau, Valley Bureau, and West Bureau. The project site is located in the South Bureau, which contains the following community police stations: 77th Street, Harbor, Southeast, and Southwest.

Police Station

The project site is served by the West L.A. Community Station at 1663 Butler Avenue located approximately 1.5 miles southeast of the project site. This station is in the West Los Angeles Area, which serves a community area encompassing 65 square miles. The LAPD defines the West Los Angeles Area by the following boundaries: Mulholland Drive to the north; Los Angeles city boundary, Pacific Coast Highway and Santa Monica Freeway to the south; Los Angeles city boundary and La Cienega Boulevard to the east; and Los Angeles city boundary to the west. The Area has a population of approximately 240,000 residents with approximately 222 sworn officers. This represents an officer to population ratio of approximately one officer per 1,082 residents. The average response time to emergency calls in the Area was nine minutes in 2008, which was higher than the citywide average for 2008 of seven minutes.

The project would be located in Reporting District (RD) 826, which is defined by the following boundaries: Sunset Boulevard to the north; San Vicente Boulevard to the south; Granville Avenue, Kearsarge Street, Westgate Avenue and Montana Avenue to the east; and Gretna Green Way to the west.

There were 33 crimes per 1,000 persons in the West Los Angeles Area in 2008, which is 37% lower than the Citywide average of 52 crimes per 1,000 persons.

Crime Statistics

Table IV.K-2 provides the crime statistics for the West LA Area and Citywide for year-to-date (YTD) 2010 (through June 5 2010) and YTD 2009. (Although there is data available for all of 2009, YTD 2009 is used to provide an accurate comparison to YTD 2010. Otherwise, the number of crimes would be skewed higher in 2009 because of the longer period of measurement.) The West LA crime rate dropped 19 percent and the citywide crime rate dropped 7% from YTD 2009 to YTD 2010. The crime rate, which

9 Marco Jimenez, Officer, Los Angeles Police Department, response to service letter request, July 28, 2009.
represents the number of crimes reported, affects the “needs” projection for staff and equipment for the LAPD. It is logical to anticipate that the crime rate in a given area will increase as the level of activity or population, along with the opportunities for crime, increases. However, because a number of other factors also contribute to the resultant crime rate, such as police presence, crime prevention measures, and ongoing legislation/funding, the potential for increased crime rates is not necessarily directly proportional to the increase in land use activity.

Unlike fire protection services, police units are often in a mobile state; hence the actual distance between a headquarters facility and the project site is often of little relevance. Instead, the realized response time is more directly related to the number of officers on the street. Response time is defined as the total time from when a call requesting assistance is placed until the time that a police unit responds to the scene. Telephone calls for police assistance are prioritized based on the nature of the call. The LAPD has a preferred response time of seven minutes for emergency calls.

Table IV.K-2
Crime Statistics for West LA Area and Citywide

<table>
<thead>
<tr>
<th>Type of Crime</th>
<th>West LA Area</th>
<th>Citywide</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>YTD 2010</td>
<td>YTD 2009</td>
</tr>
<tr>
<td>Part 1 Crimes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Homicide</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>Rape</td>
<td>8</td>
<td>13</td>
</tr>
<tr>
<td>Robbery</td>
<td>97</td>
<td>116</td>
</tr>
<tr>
<td>Aggravated Assaults</td>
<td>29</td>
<td>48</td>
</tr>
<tr>
<td>Burglary</td>
<td>273</td>
<td>355</td>
</tr>
<tr>
<td>Grand Theft Auto</td>
<td>166</td>
<td>184</td>
</tr>
<tr>
<td>Burglary Theft From Vehicle</td>
<td>618</td>
<td>766</td>
</tr>
<tr>
<td>Personal / other Theft</td>
<td>572</td>
<td>698</td>
</tr>
<tr>
<td>Total</td>
<td>1,765</td>
<td>2,181</td>
</tr>
</tbody>
</table>

Source: LAPD Compstat, West LA Area profile and LAPD Compstat Citywide profile:
Legend
- Project Site
- Reporting District 826


Figure IV.K-2
Police Station Location Map
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Regulatory Setting

City of Los Angeles Municipal Code

The latest Los Angeles Municipal Code has an effective date of June 7, 2010 and contains information relating to Public Safety and Protection in Chapter V.\textsuperscript{10} It does not list any performance standards for the LAPD.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with guidance provided in Appendix G to the State CEQA Guidelines, a significant impact would occur if a project would result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives of the police department.

Furthermore, as set forth in the City of Los Angeles L.A. CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following factors:

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

(b) The demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (i.e., facilities, equipment, and officers) and the project’s proportional contribution to the demand; and

(c) Whether the project includes security and/or design features that would reduce the demand for police services.

Project Impacts

Construction

Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention. Consequently, developers typically take precautions to prevent trespassing through construction sites. As such, temporary fencing

would be installed around the construction site to keep out the curious. Deployment of roving security guards is also an effective strategy in preventing problems from developing. The applicant will provide these security goals as described in Mitigation Measure K.3-12 (under Schools). When such common sense precautions are taken, there is less need for local law enforcement at the construction site.

Construction of the proposed project is not expected to cause significant congestion at the local study intersections (see Section IV.L, Transportation and Traffic, for further discussion). Although minor traffic delays may occur during construction, particularly during the construction of utilities and street improvements, impacts to police response times would be minimal and temporary.

Furthermore, project construction and staging would be confined to the project site and, therefore, would not interfere with LAPD access to surrounding properties or affect police response times. The proposed project would not result in adverse impacts associated with the provision of police protection services. Therefore, a less than significant impact would occur and no mitigation measures would be required with respect to project construction.

**Operation**

Implementation of the proposed retail, office, storage, and restaurant components of the project would result in an increase in employees, patrons, and other visitors within the project site, thereby generating a potential increase in the level of service calls. Crimes against persons and property typically associated with retail/restaurant complexes could occur as a result of the proposed project. The proposed project would increase the square footage and would change the buildings’ orientations onsite, but would not substantially increase the building’s size or change its uses. Therefore, the proposed project is not expected to increase the demand of the LAPD to the extent that a new station or expansion of the existing West L.A. Community Station would be required. Consequently, impacts would be less than significant. To provide for adequate police response, the West L.A. Community Station shall be made familiar with these changes as provided in mitigation measures K.2-1 and K.2-2, below.

**CUMULATIVE IMPACTS**

The proposed project, in combination with the construction and operation of the 32 related projects (see Table III-1 in Environmental Setting for a listing of related projects) would increase the demand for police protection service in the project area. Specifically, there would be increased demands for additional LAPD staffing, equipment, and facilities over time. This need would likely be funded via existing mechanisms (i.e., property taxes, sales, taxes, government funding), to which the proposed project and related projects would contribute.

The geographic context for cumulative analysis pertaining to police protection services entails the LAPD service area. Related Projects Nos. 25-32 would be located in the City of Santa Monica and served by the Santa Monica Police Department (SMPD). Only the related projects in the City of Los Angeles would

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be expected to cumulatively impact the service of the LAPD. The proposed project would not impact the SMPD.

The proposed project, in combination with the related projects, would increase the demand for police protection services in the project area. The cumulative increase of police service would require additional officers to maintain the existing ratios of officers to civilians. However, it is anticipated that any new or expanded police station would be subject to environmental review in accordance with CEQA and any potential environmental impacts would be addressed at that time.

Any new or expanded police station would be funded via existing mechanisms (i.e., sales taxes, government funding) to which the proposed project and related projects would contribute. Furthermore, similar to the proposed project, each of the related projects would be individually subject to LAPD review, and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. As such, cumulative impacts would be less than significant.

**MITIGATION MEASURES**

The proposed project would result in a less than significant impact with respect to police services. Implementation of the following mitigation measures would further reduce the less than significant impacts:

K.2-1 Upon completion of the proposed project, the project applicant shall provide the LAPD West Los Angeles Area Commanding Officer with a diagram of each portion of the project site. The diagram shall include access routes and any additional information that might facilitate police response.

K.2-2 The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Project applicant will refer to Design Out Crime Guidelines: Crime Prevention Through Environmental Design published by the Los Angeles Police Department's Crime Prevention Section. These measures shall be approved by the Police Department prior to the issuance of building permits.

**LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Project impacts would be less than significant without mitigation. Implementation of Mitigation Measures K.2-1 and K.2-2 would further reduce the project’s less than significant impacts.

Cumulative impacts would be less than significant.
ENVIRONMENTAL SETTING

Public schools in the City of Los Angeles are under the jurisdiction of the Los Angeles Unified School District (LAUSD). The project site is currently served by the following LAUSD public school facilities, which are all located within Local District 3:12

- Brentwood Science Magnet (grades K-5) located at 740 Gretna Green Way;
- Kenter Canyon Charter Elementary (grades K-5) located at 645 N. Kenter Avenue;
- Paul Revere Middle School (grades 6-8) located at 1450 Allenford Avenue; and
- University High School (grades 9-12) located at 11800 Texas Avenue.

No new schools are planned for construction in the project area to help relieve known school overcrowding.13 Currently, Brentwood Science Magnet has a shortage of 14 seats (total capacity minus current enrollment) and no future enrollment projections are available. Kenter Canyon Charter Elementary has a shortage of 7 seats and is projected to have a shortage of 43 seats in five years. Paul Revere Middle School has 642 available seats and is projected to have 532 available seats in five years. University High School has 1,518 available seats and is projected to have 1,217 available seats in five years.

Open Enrollment Policy

The open enrollment policy is a State-mandated policy that enables students anywhere in the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated “open enrollment” seats. The number of open enrollment seats is determined annually. 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.

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begins. Students living in a particular school’s attendance area are not displaced by a student requesting an open enrollment transfer to that school.\textsuperscript{14}

**School Facilities Fees**

California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan has been prepared to support the school district’s levy of the fees authorized by Section 17620 of the California Education Code.\textsuperscript{15}

The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project’s impacts on school facilities. Maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits, and subdivisions. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA or other State or local laws (Government Code Section 65996).

Pursuant to Section 65995.5-7 of the California Government Code, the LAUSD has imposed Level 2 residential developer fees at a rate of $3.87 per square foot on new residential construction, $0.47 per square foot of commercial/industrial construction, $0.28 per square foot of self-storage space, and $0.09 per square foot of parking structure construction within the boundaries of the LAUSD.\textsuperscript{16}

**Los Angeles Unified School District Standards**

The LAUSD has learning standards that comply with the California Department of Education Grade Level Content Standards.\textsuperscript{17} The standards are for curricula, not for facilities.

**ENVIRONMENTAL IMPACTS**

**Thresholds of Significance**

In accordance with guidance provided in Appendix G to the State CEQA Guidelines, a project would have a significant effect on the environment if it would result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, or need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives of the school district.

\textsuperscript{14} News Release, Los Angeles Unified School District, Office of Communications, April 17, 2000.

\textsuperscript{15} Los Angeles Unified School District, School Facilities Fee Plan, March 2, 2002.

\textsuperscript{16} Fax correspondence from Los Angeles Unified School District, Developer Fee Program Office, February 5, 2010. These rates are valid from October 23, 2009 to October 22, 2010 and are subject to change thereafter.

\textsuperscript{17} LAUSD Division of Instruction website: http://www.lausd.k12.ca.us/lausd/offices/instruct/standards/, July 6, 2009.
Furthermore, as set forth in the City of Los Angeles L.A. CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following factors:

(a) The population increase resulting from the proposed project, based on the increase in residential units or square footage of non-residential floor area;

(b) The demand for school services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvement to LAUSD services (i.e., facilities, equipment and personnel) and the project’s proportional contribution to the demand;

(c) Whether (and the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and

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

Project Impacts

The project site is currently developed with five commercial structures consisting of 34,856 sf. The proposed project would include approximately 73,300 sf of neighborhood-oriented commercial land uses, in addition to 3,700 sf of outdoor dining space. Therefore, the total net new area of commercial building space is 38,444 sf (or 42,144 sf with the outdoor dining space). As discussed in Section IV.J, Population and Housing, the project is would generate an estimated 94 net new employees.

As discussed in more detail in Section IV.J, Population and Housing, none of these employees are anticipated to relocate to the project area. If employees were to relocate, they would occupy an existing unit, which has already been taken into account for school enrollment purposes. No net increase in housing is part of the proposed project.

The LAUSD provides student generation rates for land uses besides housing. This is because the LAUSD assumes that a negligible, but countable, number of students are brought to an area as other uses are developed, often alongside housing. Student generation rates are as follows for retail/service uses:

- 0.0000238 elementary school students per square foot;

- 0.0000123 middle school students per square foot; and
• 0.0000123 high school students per square foot.\textsuperscript{18}

Based on the student generation rates provided above, the proposed project would generate less than one each of elementary, middle, and high school students. Therefore, the proposed project would not result in an additional demand on school facilities due to employee relocation.

The project site is currently developed with two single-family residences. Where the two single-family homes are currently located, the proposed project would involve the development of one single-family home resulting in a net loss of one residential unit. Therefore, the proposed project would reduce the demand on school facilities due to on-site residential uses.

Pursuant to California Education Code Section 17620(a)(1), the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities. The project applicant would pay such fees to reduce any impacts of new development on school services, as provided in Section 65996 of the California Government Code. As such, project impacts to school facilities would be less than significant.

The proposed project is located approximately 450 feet away from Brentwood Science Magnet. Based on the size and location of the proposed development, the LAUSD has provided mitigation measures designed to help reduce or eliminate traffic, pedestrian routes, and school transportation safety impacts during project construction.

**CUMULATIVE IMPACTS**

The geographic context for the cumulative analysis pertaining to schools entails the LAUSD service area. Related Project Nos. 25-32 would be located in the City of Santa Monica and served by the Santa Monica-Malibu Unified School District (SMMUSD).\textsuperscript{19} Only the related projects in the City of Los Angeles would be expected to cumulatively impact the LAUSD. The proposed project would not impact the SMMUSD.

The LAUSD has experienced a consistent classroom capacity shortfall, and depending on future enrollment trends, this shortfall may continue. However, the LAUSD’s adopted Strategic Execution Plan outlines the addition of 163,891 seats in 377 separate capital projects by the year 2012, and the vast majority of these expansions will occur in areas currently experiencing overcrowding.\textsuperscript{20}


None of the public schools that would serve the proposed project and the related projects would have adequate capacity to accommodate the cumulative student generation. Therefore, new or expanded schools may be needed, which would result in a potentially significant cumulative impact.

However, the applicants of the related projects would be required to pay developer fees to the LAUSD (pursuant to SB 50) to help reduce any impacts they may have on school services. The provisions of SB 50, discussed above, are deemed to provide full and complete mitigation of school facilities impacts. The payment of fees by the related projects would be mandatory and would reduce cumulative impacts upon school services to a less than significant level in accordance with SB 50.

**MITIGATION MEASURES**

The proposed project would result in a less than significant impact to school facilities. However, based on the project’s proximity to Brentwood Science Magnet, the LAUSD has provided the following measures to ensure that impacts during project construction remain less than significant:

K.3-1 Prior to construction, the project applicant shall contact LAUSD Transportation Branch at (323) 342-1400 regarding potential impact to school bus routes.

K.3-2 The project applicant shall maintain unrestricted access for school buses during construction.

K.3-3 The project applicant shall comply with provisions of the California Vehicle Code by requiring construction vehicles to stop when encountering school buses using red flashing lights.

K.3-4 The project applicant shall not endanger passenger safety or delay student drop-off or pickup due to changes in traffic patterns, lane adjustments, altered bus stops, or traffic lights.

K.3-5 The project applicant shall maintain safe and convenient pedestrian routes to LAUSD schools.

K.3-6 The project applicant shall maintain ongoing communication with school administration at affected schools, providing sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to school may be impacted.

K.3-7 The project applicant shall install appropriate traffic controls (signs and signals) to ensure pedestrian and vehicular safety.

K.3-8 The project applicant shall not haul past affected school sites, except when school is not in session. If that is infeasible, not haul during school arrival and dismissal times.

K.3-9 The project applicant shall not conduct staging or parking of construction-related vehicles, including worker-transport vehicles, adjacent to school sites.

K.3-10 The project applicant shall provide crossing guards when safety of students may be compromised by construction-related activities at impacted school crossings.
K.3-11 The project applicant shall install barriers and/or fencing to secure construction equipment and site to prevent trespassing, vandalism, and attractive nuisances.

K.3-12 The project applicant shall provide security patrols to minimize trespassing, vandalism, and short-cut attractions.

K.3-13 The project applicant shall pay developer fees to mitigate the project's impacts on school facilities.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts to school facilities would be less than significant.

Cumulative impacts would be less than significant.
IV. ENVIRONMENTAL IMPACT ANALYSIS

K. PUBLIC SERVICES

4. PARKS

ENVIRONMENTAL SETTING

The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. The LADRP operates and maintains 15,710 acres of parkland with 390 parks, 180 recreation centers, 59 swimming pools, 9 lakes, 7 camps (both in and out of town), more than a dozen museums and historic sites, and hundreds of programs for youth, seniors, the physically disabled, and volunteers. However, nearly 13,000 acres of parkland are located in regional parks, which are not distributed evenly across all areas of the City.

The Public Recreation Plan, a portion of the Public Facilities and Service Systems Element of the City’s General Plan, categorizes parks into three groups: neighborhood, community, and regional. Ideally, neighborhood parks are five to 10 acres in size, have a service radius of approximately one-half mile, and are pedestrian-accessible without crossing a major arterial street or highway/freeway. Community parks are ideally 15 to 20 acres, have a service radius of two miles, and are easily accessible to the area served. Regional parks in the City are ideally greater than 50 acres, provide specialized recreational facilities and/or attractions, and have a service radius encompassing the entire Los Angeles region.

The Public Recreation Plan provides standards for the provision of recreational facilities throughout the City and includes Local Recreation Standards. The standard ratio of neighborhood and community parks to population is four acres per 1,000 people. This standard ratio excludes regional parks. Thus, with a citywide neighborhood and community parkland inventory of about 2,710 acres, the citywide parkland ratio of neighborhood and community parks to population is 0.76 acres per 1,000 persons. This ratio falls below the standard established in the Public Recreation Plan.

As stated in the Brentwood-Pacific Palisades Community Plan, there are seven City parks that serve the Brentwood-Pacific Palisades Community Plan area and the Los Angeles region. The following parks and recreational centers are located within a two-mile radius of the project site:

- Will Rogers State Historic Park located at 1501 Will Rogers Park Road;

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22 15,710 acres parkland-13,000 regional parks = 2,710 acres


• Rustic Canyon Park located at Rustic Canyon Road;
• Sullivan Canyon Park located in Sullivan Canyon;
• Crestwood Hills Park located at 1000 Hanley Avenue;
• Barrington Recreation Center located at 333 S. Barrington Avenue;
• Westwood Recreation Center located at 1350 S. Sepulveda Boulevard;
• Stoner Recreation Center located at 1835 Stoner Avenue;
• Stewart Street Park located at 1880 Stewart Street in the City of Santa Monica;
• Schader Park located at 1425 Cloverfield Boulevard in the City of Santa Monica;
• Park Drive Park located at 2415 Broadway in the City of Santa Monica; and
• Douglas Park located at 2439 Wilshire Boulevard in the City of Santa Monica.

Regulatory Setting

Quimby Act

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

The Quimby Act provides two standards for the dedication of land for use as parkland. If the existing area of parkland in a community is 3 acres per 1,000 persons, then the community may require dedication based on a standard of 5 acres per 1,000 persons residing in the subdivision. If the existing amount of parkland in a community is less than 3 acres per 1,000 persons, then the community may require dedication based on a standard of only 3 acres per 1,000 persons residing in the subdivision. The Quimby Act requires a city or county to adopt standards for recreational facilities in its general plan recreation element if it is to adopt a parkland dedication/fee ordinance.
The northwestern portion of the project site that includes the two residential parcels is zoned as a Suburban Zone, RS-1-O. The current Quimby fee effective March 1, 2010 for RS zone is $1,803 per dwelling unit.25

**Public Park Preservation Act**

California Public Resources Code Sections 5400-5409, Chapter 2.5 Preservation of Public Parks describes how public agencies acquire parkland and facilities:

5404. In the event that the park land and facilities are acquired, the operating entity shall acquire substitute park land and facilities. If, however, less than 10 percent of the park land, but not more than one acre, is acquired, the operating entity may, instead of acquiring substitute park land and facilities, improve the unacquired portion of the park land and facilities, using the funds received for this purpose, after holding a public hearing on the matter and upon a majority vote of its legislative body.26

**Los Angeles Municipal Code**

Pursuant to Section 10.21.3 of the Los Angeles Municipal Code (LAMC), the City of Los Angeles imposes a mandatory dwelling unit construction tax to reduce impacts upon park and recreational facilities. The tax collected pursuant to this ordinance is required to be placed in a “Park and Recreational Sites and Facilities Fund,” to be exclusively for the acquisition and development of park and recreational sites and facilities. Any future residential development on the project site, including the proposed project, would be subject to this tax.

**ENVIRONMENTAL IMPACTS**

**Thresholds of Significance**

In accordance with guidance provided in Appendix G to the State CEQA Guidelines, a significant impact would occur if a project would:

(a) Result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives of the parks department;

25 Memorandum to David Weintraub, Senior City Planner, Division of Land from Livea Yeh, Senior Management Analysis I, Fiscal Management, Subject: New Rate for Quimby Fee Effective March 1, 2010, dated February 23, 2010.

(b) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or

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

Furthermore, as set forth in the City of Los Angeles L.A. CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following factors:

(a) The net population increase resulting from the proposed project;

(b) The demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (i.e., renovation, expansion, or addition) and the project’s proportional contribution to the demand; and

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

**Project Impacts**

In general, employees of the proposed project would be less likely to patronize parks during working hours, as they are more likely to use parks and recreational facilities near their homes during non-work hours. The proposed project, a 73,300-sf neighborhood-oriented commercial center (in addition to 3,700 sf of outdoor dining space), would not introduce any permanent residents to the project area, and as such, would not be anticipated to increase the demand for parks and recreational facilities in the vicinity.

The project site is currently developed with two single-family residences. Where the two single-family homes are currently located, the proposed project would involve development of a single-family home resulting in a net loss of one residential unit. Therefore, the proposed project would reduce the demand on parks and recreational facilities due to on-site residential uses. Nevertheless, the project applicant would be required to pay Quimby fees for the residence.27

Furthermore, project construction and staging would be confined to the project site and, therefore, no direct impacts to existing parks or recreational facilities in the project area would occur. Therefore, a less than significant impact would occur and no mitigation measures would be required.

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27 Written correspondence from Melinda Gejer, Los Angeles Recreation and Parks Department, to Jessica Viramontes, CAJA, June 9, 2010.
CUMULATIVE IMPACTS

The proposed project, in combination with the related projects, would be expected to increase the cumulative demand for parks services in the project area. Of the related projects, only those projects that would generate residents would be expected to increase parkland demand. The related projects would generate 1,115 new units and 2,049 new residents within 3 community plans (Brentwood-Pacific Palisades, West Los Angeles, and Westwood) (see Section IV.J Population and Housing). In general, the other related projects would generate employees and/or students, who would not be expected to use local park or recreational facilities to a great extent, as they typically would not have long periods of time during their work or school days to visit parks and recreational facilities, and would be more likely to patronize park and recreational facilities near their homes during non-work or non-school hours.

The increase in the residential population by cumulative growth and proposed project area would, in the absence of mitigation, lower the City’s existing parkland to population ratio, which is below their preferred standard. This could potentially result in a cumulative impact on recreational and park services. However, the inclusion of onsite recreational facilities and satisfaction of Quimby Act obligations for the individual projects would address the contributions of these projects to cumulative demand increases and the project would not contribute to any cumulative impacts since it would result in a net reduction of one residential unit. Therefore, the proposed project would not result in a cumulatively considerable contribution to cumulative impacts related to demand for recreational and park services.

MITIGATION MEASURES

No mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts to park facilities would be less than significant.

Cumulative impacts would be less than significant.
ENVIRONMENTAL SETTING

The City of Los Angeles Public Library (LAPL) provides library services throughout the City of Los Angeles. City library policy is guided by the Public Libraries Plan, which is included within the Public Facilities and Service Systems Element of the City’s General Plan. The Public Libraries Plan guides the construction, maintenance, and operation of public libraries and specifies standards in defining geographic service area and facility size.

Within the City of Los Angeles, the LAPL provides library services at the Central Library, eight regional branch libraries, 71 community branches and two bookmobile units, consisting of a total of five individual bookmobiles. Approximately 6.5 million books and other materials comprise the LAPL collection.

The Donald Bruce Kaufman-Brentwood Branch Library, located at 11820 San Vicente Boulevard, would serve the project.

Regulatory Setting

LAPL Branch Facilities Plan

The LAPL Branch Facilities Plan, Criteria for New Libraries, adopted by the Board of Library Commissioners on February 8, 2007, contains the required facilities expansion needs of the City Public Library system. According to the current LAPL Branch Facilities Plan, service criteria are based on floor area required to serve varying amounts of residential population. Current LAPL branch building size standards are presented below in Table IV.K-3. The State of California standard states that 0.5 square feet of library facility per capita should be provided.28

Table IV.K-3  
Los Angeles Public Library  
Branch Facilities Plan, Criteria for New Libraries

<table>
<thead>
<tr>
<th>Population Served</th>
<th>Size of Facility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Above 45,000</td>
<td>14,500 sf</td>
</tr>
<tr>
<td>Below 45,000</td>
<td>12,500 sf</td>
</tr>
<tr>
<td>Expansion or Special Situations</td>
<td>Special Size</td>
</tr>
<tr>
<td>Regional Branch</td>
<td>Up to 20,000 sf</td>
</tr>
<tr>
<td>Above 90,000</td>
<td>Consider second branch</td>
</tr>
</tbody>
</table>

Notes:.sf = square feet  
Due to available property size and configuration, architectural constraints or opportunities, or building code requirements, some facilities may differ from the recommended sizes.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with guidance provided in Appendix G to the State CEQA Guidelines, a significant impact would occur if a project would result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, or 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.

Furthermore, as set forth in the City of Los Angeles L.A. CEQA Thresholds Guide, the determination of significance shall be made on a case-by-case basis, considering the following factors:

(a) The net population increase resulting from the proposed project;

(b) The demand for library services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to library services (i.e., renovation, expansion, addition or relocation) and the project’s proportional contribution to the demand; and

(c) Whether the project includes features that would reduce the demand for library services (e.g., onsite library facilities or direct support to the LAPL).

Project Impacts

The project site currently contains two single-family dwelling units, and as part of the proposed project, these two dwelling units would be removed, and one single-family dwelling unit would be constructed in
their place. As the proposed project would result in a net decrease in residences, the project would not increase the LAPL’s residential service population and the Brentwood Branch Library would be able to serve the project site. Project patrons would visit the project site for the specific purpose of patronizing the facilities (e.g., retail, restaurant, office, and storage) and would not be expected to visit nearby libraries during their trip to the extent that the demand on such libraries would be significantly increased. In addition, the addition of a single-family home as part of the project would not affect LAPL’s ability to serve the project site. Therefore, a less than significant impact would occur and no mitigation measures would be required.

CUMULATIVE IMPACTS

The proposed project, in combination with the related projects, would be expected to increase the cumulative demand for library services in the project area. Of the related projects, only those projects that would generate residents would be expected to impact library service demands. The related projects would generate 1,115 new units and 2,049 new residents within 3 community plans (Brentwood-Pacific Palisades, West Los Angeles, and Westwood) (see Section IV.J Population and Housing). In general, the other related projects would generate employees and/or students, who would not be expected to use library facilities to a great extent, as they typically would not have long periods of time during their work or school days to visit libraries, and would be more likely to patronize libraries near their homes during non-work or non-school hours. The related projects would be reviewed on a case-by-case basis to ensure that no significant impacts to library services would occur. Because the proposed project would not add residents, it would not contribute to any cumulative impacts to libraries.

MITIGATION MEASURES

No mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts to library facilities would be less than significant.

Cumulative impacts would be less than significant.

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29 Rona Berns, Senior Management Analyst, Los Angeles Public Library, Library Facilities Division, response to service letter request, August 3, 2009.

30 Written correspondence from Cheryl Collins, Interim Director, Branch Library Services, to Jessica Viramontes, CAJA, June 1, 2010.
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