
IV. ENVIRONMENTAL IMPACT ANALYSIS

I. PUBLIC SERVICES

1. FIRE

a. ENVIRONMENTAL SETTING

Fire prevention, fire suppression, and life safety services are provided throughout the City of Los Angeles (City) by the Los Angeles Fire Department (LAFD), as governed by the *Fire Protection and Prevention Plan* (Plan), an element of the City's General Plan, as well as the Fire Code section of the Los Angeles Municipal Code. The Plan and the Fire Code serve as guides to City departments, government offices, developers, and the public for the construction, maintenance, and operation of fire protection facilities located within the City of Los Angeles. Policies and programs addressed in these documents include the following: fire station distribution and location, required fire flow (i.e., water supply), fire hydrant standards and locations, access provision, and emergency ambulance service.⁵³ These issues, as they pertain to the proposed Project, are discussed below.

The Project site is located within the Central City area of the LAFD's jurisdiction. The LAFD operates three fire stations that have response duties for the Project site. All three stations are Task Force Stations, as opposed to Single Engine Stations. A Single Engine Station normally has a Single Engine Company while a Task Force Station has a Truck Company and two engines assigned. These facilities, Station Nos. 3, 9, and 10, are identified on Figure 43 on page 360. In addition, backup support is provided through mutual aid agreements between the LAFD and the Los Angeles County Fire Department.

Fire Station No. 10 is located approximately 0.7 miles from the Project site⁵⁴ at 1335 South Olive Street and would have primary response duties (the proposed Project is located within the Station No. 10 first-in district, thus Station No. 10 would be the first unit responding to a call at the Project site). This Task Force Station is comprised of a truck and an engine company, a paramedic and an EMT rescue ambulance⁵⁵, and is staffed by 14 LAFD personnel. The average response time from

⁵³ *Fire Protection and Prevention Plan*, a part of the General Plan of the City of Los Angeles, adopted January 1979.

⁵⁴ All response distances were computed to the intersection of West Olympic Boulevard and South Figueroa Street.

⁵⁵ LAFD Fire Station and Equipment Directory, <http://www.cityofla.org/lafd/vehicles.htm>, September 15, 2000.

Figure 43 City of Los Angeles Fire Stations Serving the Project Site

Fire Station No. 10 throughout its first-in district is approximately 4.4 minutes. The citywide average, by comparison, is approximately 5.5 minutes.⁵⁶

Fire Station No. 3 is located approximately 1.1 miles from the Project site at 108 North Fremont Avenue. The largest of the three stations in terms of equipment and personnel, this Task Force Station is furnished with a truck and an engine company, a paramedic and an EMT rescue ambulance, a hazardous materials response unit, a bus, emergency lighting⁵⁷, and is staffed by 15 LAFD personnel. This facility serves as Division One Headquarters. The average response time from Fire Station No. 3 throughout its first-in district is approximately 4.4 minutes.⁵⁸

Fire Station No. 9 is located approximately 1.1 miles from the Project site at 430 East 7th Street. This Task Force Station is equipped with a truck company, an engine company, and a paramedic rescue ambulance⁵⁹, and is staffed by 13 LAFD personnel. This station serves as Battalion One Headquarters. The average response time from Fire Station No. 9 throughout its first-in district is approximately 3.8 minutes.⁶⁰

Currently, the project site consists primarily of surface parking lots. Therefore, the current need for fire and emergency medical services at the project site is minimal.

In addition to facility equipment, personnel, and location, fire flow is an important factor in fire suppression activities. Fire flow is defined as the quantity of water available or needed for fire protection in a given area and is normally measured in gallons per minute (gpm), as well as duration of flow. The quantity of water necessary for fire protection varies by land use type, life hazard, occupancy, and the degree of fire hazard. Based on these factors, the LAFD requires flows ranging from 2,000 gpm from three adjacent fire hydrants flowing simultaneously in low density residential areas, to 12,000 gpm available to any city block in high density commercial or industrial areas. High density areas in which simultaneous fires might occur, such as high occupancy mixed use districts, may require fire flows above these standards. A minimum residual water pressure of 20 pounds per square inch (psi) is required to remain in the water system, while the necessary gpm is flowing, in order to be considered adequate by Fire Code standards.⁶¹

⁵⁶ Telephone conversation with Inspector Kevin Hamilton, LAFD, Construction Services, Hydrant Unit, September 18, 2000.

⁵⁷ LAFD Fire Station and Equipment Directory, <http://www.cityofla.org/lafd/vehicles.htm>, September 15, 2000.

⁵⁸ Telephone conversation with Inspector Kevin Hamilton, LAFD, Construction Services, Hydrant Unit, September 18, 2000.

⁵⁹ LAFD Fire Station and Equipment Directory, <http://www.cityofla.org/lafd/vehicles.htm>, September 15, 2000.

⁶⁰ Telephone conversation with Inspector Kevin Hamilton, LAFD, Construction Services, Hydrant Unit, September 18, 2000.

⁶¹ Fire Code of the Los Angeles Municipal Code, Section 57.09.06.

Fire hydrants and building fire water service systems connect directly to local water mains. The fire service system for each building or structure, however, has water lines, vaults, etc., for fire water flows that are separate from their respective domestic water systems.⁶² Fire flows are only required intermittently, and usage is therefore not monitored.

Fire hydrant type and spacing is dependent upon land use. In high density commercial areas, such as the Project site, fire service systems must be connected to double hydrants measuring 4-inches by 4-inches, located a maximum distance of 300 feet apart. The net land area served by each hydrant is limited to approximately 40,000 square feet for high density commercial uses.⁶³ Uses such as the proposed Project are likely to require conservative hydrant type, spacing and service area limitations reflected by the hydrant requirements for high density commercial uses, although specific hydrant requirements are determined during plot plan review.

The City of Los Angeles Fire Code specifies maximum response distances allowed between specific sites and engine and truck companies, based upon land use and fire flow requirements. As described in Section IV.A, Land Use, of this document, the Project site locale is considered part of the Downtown Center, with the site designated as downtown commercial and mixed land use. For high density commercial land uses, the Fire Code indicates a maximum response distance of 0.75 mile to the nearest engine company and 1.0 mile to the nearest truck company. Where 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.).

b. PROJECT IMPACTS

(1) Significance Thresholds/Methodologies

A significant impact to LAFD fire prevention and suppression services and/or emergency medical services would occur if the proposed Project: (1) generates demand for additional fire protection service that exceeds the staff and equipment capabilities of the LAFD to serve the Project site; (2) does not comply with all applicable LAFD code and ordinance requirements for construction, fire flow, water mains, fire hydrants, and access; or (3) generates construction activity or traffic levels that would substantially increase emergency response time to the Project site or neighboring properties.

⁶² *Community Redevelopment Agency of the City of Los Angeles, Los Angeles Sports and Entertainment Complex Draft EIR, March 26, 1997.*

⁶³ *Fire Code of the Los Angeles Municipal Code, Section 57.09.06*

(2) Analysis of Project Impacts

(i) Construction

Although construction of the Project would contribute to traffic levels in the area, both construction worker and truck trips would be predominantly freeway-oriented and would generally occur during off-peak hours. Given the proximity of regional freeways and the generally acceptable levels of service (LOS) at intersections in the vicinity of the Project site during off-peak hours, impacts on area surface streets would be minimal. Although minor traffic delays may result, particularly on freeway ramps, these impacts would be temporary in nature and therefore not significant. (See Section IV.F.1, Traffic, for further discussion.) As shown on Figure 43 on page 360, the Project site is in close proximity to LAFD Fire Stations 3, 9, and 10 (1.1, 1.1, and 0.7 miles, respectively), and are within allowable response time distances. Fire and emergency medical vehicles can generally respond to the Project site area without the use of nearby freeways. LAFD emergency response times would not be significantly impacted by construction traffic associated with the Sports and Entertainment District. No significant impacts would occur.

Construction of the proposed Project may result in temporary lane closures in the immediate area of the Project. The LAFD shall be notified of all construction scheduling in order to plan appropriate alternative response routes. Public detour routes would be established where required to divert traffic from the affected street segments. Due to the temporary and limited nature of the closures along roadways and the wide selection of alternative routes to and through the Project site, street and/or lane closures would not be expected to significantly affect emergency access or emergency response times. Project construction will comply with all LAFD code and ordinance requirements. Further, no additional demand for fire protection services beyond current capabilities would be expected to occur during construction. Mitigation measures have been developed to reduce potentially significant impacts during construction to less than significant levels.

(ii) Operation

The proposed Project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the *Fire Protection and Fire Prevention Plan Element*, as well as the *Safety Element*, both of which are elements of the *General Plan of the City of Los Angeles*.

(1) Demand

The adequacy of fire protection for a given area is based on required fire flow, response distance from existing fire stations, and the LAFD's judgment for needs in the area. In general, the

required fire flow is closely related to 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.⁶⁴

Project uses shall include approximately 1,590,000 square feet of hotel, 1,115,000 square feet of retail/entertainment/restaurant, 425,000 square feet of office/commercial, and 870,000 square feet of residential development. Implementation of the proposed Project would increase the need for LAFD fire protection and emergency medical services at the Project site. Mitigation measures have been developed to reduce this potentially significant impact to a level of insignificance.

The Project site is located approximately 0.6 miles from the nearest engine and truck companies (both at Fire Station No. 10). Since this response distance is within City Fire Code requirements pertaining to engine and truck companies, impacts with respect to distance criteria are considered less than significant.

Because major sports and entertainment structures associated with the proposed Project generally accommodate high-density/high-occupancy loads on an intermittent basis, the LAFD has developed aggressive deployment standards for similar uses. The typical deployment for such structures includes two Task Forces and an additional engine company, and may potentially include an emergency medical technician (EMT) unit if any of the responding stations is so equipped. Thus, in general, five engines (i.e., pump vehicles) and two trucks (i.e., aerial ladder vehicles) respond to emergency calls originating from major sports and entertainment developments.⁶⁵ Because there are three LAFD fire stations located within close proximity to the Project site, no significant impacts to LAFD staff and equipment capabilities are anticipated.

(2) Emergency Vehicle Access and Response Times

Emergency vehicle access to the proposed Project would continue to be provided from local public roadways such as Figueroa Street, 11th Street, and Pico Boulevard. Major roadways traversing and adjacent to the Project site would continue to provide public and emergency access. During the post-event period of events at the STAPLES Center and the Los Angeles Convention and Exhibition Center, traffic could result in considerable congestion at many area streets and intersections in the vicinity of the Project site. This traffic congestion could potentially cause significant delays in LAFD emergency response times for responses within or through the project site, thereby creating delays for other occupants and residents in the area. Mitigation measures have been developed to reduce this potentially significant impact to a less than significant level. Fire

⁶⁴ Correspondence from Richard A. Warford, Assistant Fire Marshal, LAFD, Bureau of Fire Prevention and Public Safety, September 20, 2000.

⁶⁵ Community Redevelopment Agency of the City of Los Angeles, Los Angeles Sports and Entertainment Complex Final EIR, June 9, 1997.

lanes would be developed for secondary emergency access, as required by the Fire Code and the LAFD.

(3) Fire Flow

Water service for fire fighting purposes would continue to be provided by the City of Los Angeles Department of Water and Power (DWP). The existing water system, in conjunction with proposed realignments, would serve both domestic and fire water needs. There are two pressure zones that supply the section of downtown that includes the Project site. The first zone extends as far south as Olympic Boulevard. This zone has a static water pressure of approximately 90 psi at the Project site. The second zone includes the area from Olympic Boulevard south and encompasses most of the Project site. The southern zone has a static water pressure of approximately 63 psi at the Project site.⁶⁶ Therefore, the adjacent water lines currently maintain a water pressure well in excess of the required 20 psi residual pressure.

Exact fire flow requirements cannot be exactly determined at this time, because flow requirements are based on the final configuration of the project. When the final site plan is submitted, the LAFD will dictate fire flow requirements in terms of flow and pressure required. The fire flow required for the LAFD for the proposed Project is 4,000 gpm (i.e., 1,000 gpm from 4 fire hydrants flowing simultaneously)⁶⁷, although the Project could necessitate fire flow as high as 9,000 to 15,000 gpm. In order to determine if the existing water system is adequate to meet fire flow demand, the Water Operations Division of DWP will conduct a flow study prior to issuance of any building permits. In order to ensure adequate fire flows are provided to the proposed Project, a related mitigation measure is provided below.

Based on the results of the flow study and LAFD requirements, further expansion to the existing system and site-specific fire suppression improvements may be required. The size and location of the laterals cannot be determined at this time. In order to meet fire flow requirements, the project is expected to require upsizing of approximately 900 feet of the 8-inch water line in Olympic Boulevard to a 12-inch water line, and the construction of an 8-inch water line in Cherry Street, between 11th Street and Olympic Boulevard.

Hydrants shall be installed per Fire Code and LAFD requirements for the hotel, retail/entertainment/restaurant, office/commercial, and residential development uses associated with the proposed Project. It is expected that additional fire hydrants will be required both on public right-of-way and possibly on private property. Installation of automatic fire sprinklers would be

⁶⁶ Psomas, *Los Angeles Sports and Entertainment District, Preliminary Water, Sewer and Storm Drain Infrastructure Report*, September 13, 2000.

⁶⁷ Correspondence from Richard A. Warford, Assistant Fire Marshal, LAFD, Bureau of Fire Prevention and Public Safety, September 20, 2000.

undertaken in coordination with the LAFD. Supplemental fire protection devices (e.g., fire alarms, fire extinguishers, emergency exits, etc.) would also be incorporated into new Project structures, as required by LAFD. Mitigation measures have been developed to reduce the potentially significant impact to fire flow service to a level of insignificance.

c. MITIGATION MEASURES

The following mitigation measures for fire protection and emergency medical service shall be employed during the construction and operation of the proposed Project:

i. Construction

1. The Applicant shall ensure that during construction, LAFD access will remain clear and unobstructed.
2. Proposed roadway modifications shall be reviewed by the LAFD to assure adequate access to the Project site and adjacent uses.
3. The DWP shall conduct a flow test prior to the issuance of certificates of occupancy to determine whether the existing water system meets fire flow requirements imposed by the Fire Department for the Project. The Applicant shall undertake and complete those required improvements identified by the DWP as a result of findings of the flow test.

ii. Operations

4. The proposed Project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the *Fire Protection and Fire Prevention Plan Element*, as well as the *Safety Element*, both of which are elements of the General Plan of the City of Los Angeles.
5. The Applicant shall submit definitive plans and specifications to the LAFD and requirements for necessary permits shall be satisfied prior to commencement of construction on any portion of the proposed Project.
6. The Project shall provide access for LAFD apparatus and personnel to and into all structures shall be required. At least two different ingress/egress roads for each area, which will accommodate major fire apparatus and provide for major evacuation during emergency situations, shall be required. Additional vehicular access may be required by the LAFD where buildings exceed 28 feet in height.

7. The Applicant shall submit plans that show proposed access road(s) and turning area(s) for LAFD approval.
8. Project development shall conform to the standard street dimensions shown on Department of Public Works Standard Plan D-22549.
9. Project design shall use standard cut-corners on all street corners to permit easy turning access for LAFD vehicles.
10. Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of an LAFD aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.
11. Fire lanes, where required, and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No fire lane or dead ending street shall be greater than 700 feet in length or secondary access shall be required.
12. All access roads, including fire lanes, shall be maintained in an unobstructed manner, and removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05. of the *Los Angeles Municipal Code*.
13. Where above ground floors are used for residential purposes, the access requirement shall be interpreted as being the horizontal travel distance from the street, driveway, alley, or designated fire lane to the main entrance, or exit of individual units.
14. To accommodate an LAFD apparatus, if necessary, the minimum outside radius of paved surface shall be 35 feet. An additional six feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface of the roadway.
15. Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.
16. No building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
17. Adequate off-site public and on-site private fire hydrants may be required. Their number and location are to be determined after the LAFD's review of the Project's plot plan. The maximum distance between fire hydrants on roads and fire lanes in a regional commercial area is 300 feet.
18. A new or modified Parking and Circulation Management Plan, which addresses vehicle and pedestrian flows for Project-related events (see Section IV.F.1, Traffic), shall also identify measures for ensuring LAFD access to the Project site, parking lots, and the immediate vicinity during the post-event period.

d. ADVERSE EFFECTS

After the incorporation of mitigation measures, no adverse effects to fire and emergency medical services, response times or fire flow would occur.

e. CUMULATIVE IMPACTS

The proposed Project in combination with related projects would not result in any adverse impacts to fire/emergency medical services or response times. Related project applicants would be required to coordinate with the LAFD to ensure that related project construction and operations would not significantly impact LAFD response times. In addition, related project applicants would be required to design and operate their facilities to ensure sufficient fire flow. No significant cumulative impacts are anticipated.

IV. ENVIRONMENTAL IMPACT ANALYSIS

I. PUBLIC SERVICES

2. POLICE

a. ENVIRONMENTAL SETTING

Police protection services for the Central City area are provided by the Los Angeles Police Department (LAPD), which operates 18 service areas citywide. The Project site is located within the LAPD's Central Bureau - Central Area, a triangle-shaped area of approximately 5.1 square miles, bounded roughly by Lilac Terrace, Stadium Way, Elysian Park Avenue, Lookout Drive, and the Harbor/Pasadena Freeway to the north, the Los Angeles River to the east, Sunset Boulevard and the Harbor Freeway to the west, and West Washington Boulevard, Maple Street, and West 7th Street to the south.⁶⁸ The Central Area is further subdivided into 52 reporting districts, which are small geographic units used for resource deployment purposes and statistical analysis.⁶⁹ The Project site falls within two reporting districts, Reporting Districts 171 and 182, and is adjacent to Reporting District 181, collectively defined by the Harbor Freeway, West 9th Street, South Hill Street, and West Pico Boulevard.

The Central Community Police Station is located at 251 East 6th Street in Los Angeles, approximately 1.4 miles east of the site. The Central Community Police Station is staffed by approximately 328 sworn and 32 civilian members of the LAPD and is responsible for all police operations in downtown Los Angeles. The average response time to emergency calls in the Central Area is 5.6 minutes which compares favorably with the citywide average of 6.6 minutes.⁷⁰ The Central Community Police Station, Reporting Districts 171, 181 and 182, and the project site are shown on Figure 44 on page 370.

Numbers of selected crimes and attempts by crime category for January through June 2000 were obtained for Reporting Districts 171, 181 and 182 from the LAPD⁷¹, and are shown in Table 43 on page 372. In addition, the average number of selected crimes and attempts by crime category

⁶⁸ *Written response to Los Angeles Sports and Entertainment District Notice of Preparation from Commander Sharon Papa, Community Affairs Group, Community Relations Section, October 27, 2000.*

⁶⁹ *Draft City of Los Angeles Citywide CEQA Technical Guide, August 1996.*

⁷⁰ *Telephone communication with Officer Tanya Hanamakai, Community Relations Section, Crime Prevention Unit, September 14, 2000 and response to Los Angeles Sports and Entertainment District Notice of Preparation from Commander Sharon Papa, Community Affairs Group, Community Relations Section, October 27, 2000.*

⁷¹ *Facsimile from Officer Tanya Hanamakai, Community Relations Section, Crime Prevention Unit, September 14, 2000.*

Figure 44 City of Los Angeles Police Department Central Area and Reporting Districts

for all 52 Reporting Districts included in the Central Area is also provided. Crime statistics for Reporting District 171 accurately represent existing crime conditions at the project site. Crime statistics for Reporting District 182 may not accurately represent existing crime conditions for that portion of the project site that falls within Reporting District 182. This is because Reporting District 182 encompasses a much larger geographic area than just the project site. In addition, existing land uses on the project site that fall within Reporting District 182 are primarily surface parking lots, which are different than the commercial, industrial and residential land uses that characterize the majority of Reporting District 182.

As shown in Table 43, Reporting District 171 is currently at or below the average for the 52 Reporting Districts for almost all categories of selected crimes. For Reporting District 181, crimes and attempts that are noticeably higher than the 52 Reporting District average include breaking and entering into automobiles, and theft.

There is an existing command staff post located in the STAPLES Center. The post is staffed by the LAPD during STAPLES Center events.

b. PROJECT IMPACTS

(1) Significance Thresholds/Methodologies

The LAPD makes determinations regarding the adequacy of police protection services for each service area and the City as a whole, based upon evaluation of area conditions. A project would result in a significant impact to police protection services if it: (1) generates demand for additional police protection services that exceeds the capability of the LAPD to serve the Project site; or (2) causes a substantial increase in emergency response times as a result of increased traffic congestion, during either construction or operation of the project.

(2) Analysis of Project Impacts

(a) Construction

Although construction of the proposed Project would contribute to traffic levels in the area, both construction worker and truck trips would be predominantly freeway-oriented and would generally occur during off-peak hours. Given the proximity of regional freeways and the generally acceptable levels of service (LOS) at intersections in the vicinity of the Project site during off-peak hours, impacts on area surface streets would be minimal. Although minor traffic delays may result, particularly on freeway ramps, these impacts would be temporary in nature and therefore not significant. See Section IV.F.1, Traffic, for further discussion. As shown on Figure 44 on page 370, the Central Area Community Police Station is centrally located within its service area. Police

Table 43

**LAPD SELECTED CRIMES AND ATTEMPTS BY REPORTING DISTRICT
JANUARY – JUNE 2000**

	RD 171	RD 181	RD 182	Average for 52 RDs in Central Area
Breaking and Entering	5	2	18	5
Robbery	1	5	15	8
Murder	0	0	0	0
Rape	0	1	4	1
Aggravated Assault	6	7	31	11
Breaking and Entering into Automobile	7	48	60	14
Theft	13	102	41	31
Auto Theft	6	11	18	5
Total	38	176	187	75

Source: LAPD, September 2000.

vehicles can generally respond to sites throughout the Central Area without the use of nearby freeways. LAPD emergency response times would not be significantly impacted by construction traffic associated with the Sports and Entertainment District. No significant impacts would occur.

Construction of the proposed Project may result in temporary lane closures in the immediate area and the portion of 12th Street between Flower Street and Figueroa Street shall be realigned to facilitate traffic flow. The LAPD would be notified of all construction scheduling in order to plan appropriate alternative response routes. Public detour routes would be established where required to divert traffic from the affected street segments. Due to the temporary and limited nature of the closures along roadways and the wide selection of alternative routes to and through the Project site, street and/or lane closures would not be expected to significantly affect emergency access or emergency response times. However, mitigation measures have been developed to reduce this potentially significant impact during construction to a less than significant level.

During construction, the on-site storage of construction equipment and building materials could result in theft. This may potentially necessitate police involvement unless adequate safety and security measures are implemented. A mitigation measure has been developed to reduce this potentially significant impact during construction to a less than significant level.

(b) Operation

The proposed Project is anticipated to accommodate high density/high occupancy events on an intermittent basis. Event-related population increases of this nature would initially generate demand for additional security officers during events at the Project site and at STAPLES Center,

especially for crowd and traffic control. The extent of additional protection needed would vary in accordance with the type of event and expected number of spectators. Project uses include approximately 1,590,000 square feet of hotel, 1,115,000 square feet of retail/entertainment/restaurant, 425,000 square feet of office/commercial, and 870,000 square feet of residential development. Additional police services would be needed to serve these proposed uses. The need for additional police services could extend off-site during events at the Project site and at STAPLES Center when peak usage generates off-site parking and associated pedestrian traffic. Mitigation measures have been developed to reduce this potentially significant impact to a less than significant level.

Reporting Districts for portions of the Project site currently have a higher than average crime rate (in comparison with the average for all 52 Reporting Districts in the Central Area) for breaking and entering into automobiles and theft. With the development of additional entertainment uses, and parking and pedestrians associated with these uses, these types of crimes could increase on-site and off-site when the Project generates off-site parking during peak-usage. This could place an increased demand on police protection services. Mitigation measures have been developed to reduce this potentially significant impact to a less than significant level.

The proposed Project would include security features that would attempt to minimize the potential for crime on-site and demand for additional police protection service. These features would include the provision of a private on-site security force during events at the proposed Project and STAPLES Center, and regular patrols when events are not taking place, appropriate security and parking lot lighting, and development of an Emergency Procedures Plan to facilitate security response by proposed Project personnel. Additional systems in place to further enhance security in the vicinity of the Project site, during regular as well as special events, include regular patrols by the LAPD and foot and bicycle patrols by uniformed security officers, which are funded via an existing Business Improvement District. In addition, most of the off-site parking lots that could be potentially used during peak Project activity periods have their own security personnel. Furthermore, additional appropriate security measures would be implemented by the Applicant in coordination with the LAPD. As an example of how this will be implemented, the Applicant will complete an annual assessment of off-site Project related crime, in coordination with the LAPD, subject to the approval of the City Planning Department, and in response develop and implement additional security measures. These security measures, in addition to the mitigation measures that have been developed, reduce this potentially significant impact to a less than significant level.

Emergency access to the proposed Project would continue to be provided from local public roadways. Major roadways traversing and adjacent to the Project site would continue to provide public and emergency access. During events at the STAPLES Center and the Los Angeles Convention and Exhibition Center, and during the post-event period, traffic could result in considerable congestion at many area streets and intersections in the vicinity of the project site. This traffic congestion could potentially cause significant delays in LAPD emergency response times for

responses within or through the project site, thereby creating delays for other occupants and residents in the area. Mitigation measures have been developed to reduce this potentially significant impact to a less than significant level.

c. MITIGATION MEASURES

The following mitigation measures would be employed to provide adequate on-site security and minimize on-site demand for police protection service during the construction and operation of the proposed Project:

(1) Construction

1. The Applicant shall ensure that during construction, LAPD access will remain clear and unobstructed.
2. Proposed roadway modifications shall be reviewed by the LAPD to assure adequate access to the proposed Project and adjacent uses.
3. The Applicant shall provide security features on the construction site(s), such as guards, fencing, and locked entrances.

(2) Operations

4. The Applicant shall submit plot plans for all proposed development to the Los Angeles Police Department's Crime Prevention Section for review and comment. Security features subsequently recommended by the LAPD shall be implemented to the extent feasible.
5. The Applicant shall file building plans with the LAPD Central Area Commanding Officer. Plans shall include access routes, floor plans, and any additional information that might facilitate prompt and efficient police response.
6. Alarms and/or locked gates shall be installed on doorways providing public access to commercial facilities.
7. Landscaping shall not be planted in a way that could provide cover for persons tampering with doors or windows of commercial facilities, or for persons lying in wait for pedestrians or parking garage users.
8. Additional lighting shall be installed where appropriate, including on the Project site and in parking garages, as determined in consultation with the LAPD.

9. Safety features shall be incorporated into project design to assure pedestrian safety, assist in controlling pedestrian traffic flows, and avoid pedestrian/vehicular conflicts on-site. Safety measures may include provision of security and traffic control personnel; approved street closures for special events or peak pedestrian activity; clearly designated, well-lighted pedestrian walkways on-site; special street and pedestrian-level lighting; physical barriers (e.g., low walls, landscaping), particularly around the perimeter of the parking garages, to direct pedestrians to specific exit locations that correspond to designated crosswalk locations on adjacent streets; guide signs for Project site-bound pedestrians approaching the site from the Pico Blue Line Metro station; and provision of an on-site bus passenger drop-off facility.
10. The Applicant shall develop and implement a new or modified Security Plan to minimize the potential for on-site crime and the need for LAPD services. The plan would outline the security services and features to be implemented, as determined in consultation with the LAPD. The following shall be included in the plan:
 - a. Provision of an on-site security force that would monitor and patrol the Project site. During operational hours, security officers shall perform pedestrian, vehicular, and/or bicycle patrols.
 - b. Implementation of a video camera surveillance system and/or a closed-circuit television system;
 - c. Additional security features shall be incorporated into the design of proposed parking facilities, including “spotters” for parking areas, and ensuring the availability of sufficient parking either on- or off-site for all building employees and anticipated patrons and visitors;
 - d. Security lighting incorporating good illumination and minimum dead space in the design of entryways, seating areas, lobbies, elevators, service areas, and parking areas to eliminate areas of concealment. Security lighting shall incorporate full cutoff fixtures which minimize glare from the light source and provide light downward and inward to structures to maximize visibility;
 - e. Provision of lockable doors at appropriate Project entryways, offices, retail stores, and restaurants;
 - f. Installation of alarms at appropriate Project entryways and ancillary commercial structures;
 - g. The City shall approve of all businesses desiring to sell or allow consumption of alcoholic beverages through specific plan regulation or issuance of one or more Conditional Use Permits;
 - h. Accessibility for emergency service personnel and vehicles into each structure, and provision to the Central Area Commanding Officer of detailed diagram(s) of the Project site, including access routes, unit numbers, and any information that would facilitate police response.

- i. In addition, security procedures regarding initial response, investigation, detainment of crime suspects, LAPD notification, crowd and traffic control, and general public assistance shall be outlined in the Security Plan. The plan would be subject to review by the LAPD, and any provisions pertaining to access would be subject to approval by the City of Los Angeles Department of Transportation.
11. The Applicant shall develop and implement a Emergency Procedures Plan to address emergency concerns and practices. The plan shall be subject to review by the LAPD, and any provisions pertaining to access would be subject to approval by the City of Los Angeles Department of Transportation.
12. A new or modified Parking and Circulation Management Plan which addresses vehicle and pedestrian flows for Project-related events (see Section IV.F.1, Traffic) shall also identify measures for ensuring Police Department access to the Project site, parking lots, and the immediate vicinity during the post-event period. Traffic control personnel may be provided on adjacent roadways and in parking areas during Project-related events and immediately preceding and following events to help prevent vehicles and pedestrians from obstructing emergency access.
13. The Applicant shall complete an annual assessment of off-site Project related crime, in coordination with the LAPD, subject to the approval of the City Planning Department, and in response develop and implement additional security measures.

d. ADVERSE EFFECTS

After the incorporation of mitigation measures, no adverse effects to police protection services or response times would occur.

e. CUMULATIVE IMPACTS

The proposed Project, in combination with the related projects and background growth identified in Section III.B, Cumulative Development, would result in an increased demand for police services. As for the proposed Project, any future projects would likely include specific features designed to reduce impacts on police services. Future projects would be evaluated individually to determine appropriate measures to address new demand. Applicants for related projects would be required to coordinate the design and operation of their facilities with the LAPD. In addition, the need for additional police officers, staffing, and/or facilities generated by cumulative growth and demand for police services may be addressed through the City's annual budgeting process and capital improvement programs, should the City determine that service improvements are necessary. As these measures are beyond the scope and control of the proposed Project, impacts to police services are determined to be cumulatively significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS
I. PUBLIC SERVICES
3. SCHOOLS

Project impacts upon schools are related to direct increases in population resulting from the housing supply created by The Los Angeles Sports and Entertainment District (the Project), and indirect increases in population due to employment at the Project site. Please refer to Section IV.C, Population, Housing, and Employment for additional information regarding population, housing, and employment increases.

The supply of schools can also be affected by development activities. An effect on the supply of schools would typically result from a project involving school construction or school relocation.

a. Environmental Setting

The Project site is located within the Los Angeles Unified School District (LAUSD), which provides both primary and secondary educational services for both the City and County of Los Angeles. The LAUSD is the second largest school district in the United States, with a total enrollment of over 700,000 students. The LAUSD serves students living in an area of over 700 square miles with 645 schools, including 440 elementary, 71 middle, 52 high, 43 continuation, 18 alternative, 18 special education, 2 K-12, and one community day school. The City of Los Angeles makes up the majority of LAUSD, with all but a very small portion of the City within its boundaries. Eight other cities – Cudahy, Gardena, Huntington Park, Lomita, Maywood, San Fernando, Vernon, and West Hollywood – also lay completely within the boundary of LAUSD. Additionally, LAUSD serves portions of 16 other nearby cities and unincorporated areas of Los Angeles County⁷².

The Southern California Association of Governments (SCAG), the region's federally-designated metropolitan planning organization, is responsible for preparing the *Regional Transportation Plan* (RTP). Adopted in May 1998, the RTP contains a set of baseline socioeconomic projections including projections of total population, households, and employment at the regional, county, subregional, jurisdictional and census tract levels. The RTP uses 1994 as the base year with projections for the years 2000, 2005, 2010, 2015, and 2020. Because 2000 Census data is not yet available, SCAG RTP projections are currently the most useful set of population, household, and employment forecasts for the type of analysis contained in this EIR. SCAG

⁷² *Los Angeles Unified School District, School Facilities Fee Plan, March 2000, page 3-3*

forecasts were used to make the projections of housing growth used in LAUSD's *School Facilities Fee Plan* and the *School Facilities Needs Analysis*.

Table 44 on page 379, shows the projected number of housing units and the growth in housing units for 1999 and 2010 for the LAUSD service area, based on forecasted number of households within the boundaries of LAUSD.

Housing units within LAUSD are projected to increase to nearly 2 million by 2010. Housing vacancy rate for the LAUSD, the percentage of unoccupied housing units, is approximately 5 and one-half percent, and is expected to remain stable in the future. Likewise, the occupancy rate, the average number of persons occupying a unit, is anticipated to remain stable, insofar as the economy continues its current strength⁷³

(1) Current and Recent Historical Enrollment from Existing Housing

The LAUSD is presently experiencing its highest total enrollment in history. After enduring a small decrease in total enrollment in the early 1990's, enrollment has rebounded sharply, increasing nearly 10 percent during the past five years. Table 45 on page 380 displays the total enrollment in LAUSD over the past 10 years.

(2) Projected Future Enrollment from Existing Housing

Enrollment in LAUSD schools from existing housing is forecasted to decrease slightly in the next decade. Current forecasts call for an enrollment decrease of slightly over nine percent over the next 10 years. This is in obvious contrast with the enrollment growth realized by LAUSD in the previous decade. This expected reduction is attributed to declining birth rates and the resultant decrease in student generation rates⁷⁴. Table 46 on page 381 shows the projected decrease in student enrollment from the existing housing supply.

(3) Projected Future Enrollment from New Housing Construction

Although enrollment in LAUSD schools from existing housing is forecasted to decrease slightly over the next decade, total enrollment is expected to increase slightly, due to a total of 97,800 students generated from anticipated new housing development in the LAUSD area. Total future enrollment is expected to rise from 711,200 in 1999-2000 to 742,700 in 2010. This increase in total enrollment, 4.4 percent, is forecasted to be slightly under one-third of the 13.8 percent enrollment increase seen in the previous decade.

⁷³ *Ibid*, page 3-4.

⁷⁴ *Ibid*, page 3-6.

Table 44

PROJECTED HOUSING SUPPLY LOS ANGELES UNIFIED SCHOOL DISTRICT

	Housing Units in District 1999^a	Increase 1999-2009	Housing Units 2010^a
City of Los Angeles	1,331,400	194,600	1,526,000
Unincorporated Los Angeles County	268,600	39,300	307,900
Other Cities	125,000	18,300	143,300
Total LAUSD	1,725,000	252,200	1,977,200

^a January 1, 1999 and January 1, 2010

Sources: Los Angeles Unified School District School Facilities Fee Plan, March 2000.

(4) Open Enrollment

LAUSD utilizes a State-mandated open enrollment policy that enables students anywhere within the district to apply to any regular, grade-appropriate Los Angeles public school with designated “open enrollment” seats. Open enrollment is designed to help relieve school overcrowding by affording students the opportunity to transfer to a school of their choice, subject to space availability. LAUSD does not supply school bus transportation for the open enrollment program. There were 22,000 students attending schools other than their neighborhood area schools through the open enrollment option in 1999, and anticipate approximately 6,000 seats available for 2000.⁷⁵

(5) Portable Classrooms

LAUSD employs the use of portable classrooms to assist in the relief of school overcrowding. These facilities are designed to accommodate 25 students per portable unit for elementary schools and 30 students per portable unit for junior high and senior high schools. Utilization of portable classrooms is subject to an open space requirement.

(6) Regulatory Framework

Senate Bill 50 (SB 50) was enacted in August 1998, and represents the most comprehensive school facility finance and developer fee reform legislation since the adoption of the 1986 School Facilities Act. SB 50 provides for a program of comprehensive school facilities financing and reform by authorizing a \$9.2 billion school facilities construction and modernization bond, and by establishing a new program to provide state funding for school facilities. The legislation states that local agencies are restricted, with but a few exceptions, from exacting fees or other requirements to mitigate the effects of new land development on school facilities beyond the fee amounts authorized

⁷⁵ Los Angeles Unified School District, Press Release of April 22, 1999

Table 45**TOTAL LAUSD ENROLLMENT**

Year	Total Enrollment
1999-2000	711,187
1998-1999	691,143
1997-1998	681,505
1996-1997	667,627
1995-1996	649,054
1994-1995	636,416
1993-1994	639,687
1992-1993	641,206
1991-1992	639,699
1990-1991	625,461

Sources: Los Angeles Unified School District School Facilities Fee Plan, March 2000.

by SB 50. SB 50 states that the maximum fee amounts allowed by the bill are “deemed to provide full and complete school facilities mitigation” for purposes of CEQA⁷⁶. Pursuant to the bill, initial, or “Level 1” fees that can currently be charged by a school district are \$2.05 per square foot of residential construction and \$0.33 per square foot of commercial construction. These rates were amended by the State Allocation Board, a specialized board within the California Department of General Services in January 2000. The State Allocation Board is responsible for determining the allocation of State resources used for the construction and modernization of local public school facilities.

b. PROJECT IMPACTS

(1) Significance Threshold/Methodologies

A project would have a significant impact on school facilities if it would generate an amount of new students that would exceed the capacity of the schools designated to serve the project site.

(2) Analysis of Supply of School Facilities

The Project does not contain any school construction, so there is no impact on the supply of school facilities available to students generated at the Project site.

⁷⁶ *Government Code, Section 65996(b)*

Table 46

PROJECTED ENROLLMENT FROM EXISTING HOUSING

Grade Level	1999-2000 Enrollment	2010-2011 Enrollment	Change in Enrollment
Elementary (K-5)	381,200	324,600	-56,600
Middle (6-8)	153,300	141,000	-12,300
High (9-12)	176,700	179,300	2,600
Total	711,200	644,900	-66,300

Source: Los Angeles Unified School District School Facilities Fee Plan, March 2000.

(3) Analysis of Demand for School Facilities

The Project includes the construction of 800 new residential dwellings. These dwellings are all located in adjacent structures, and therefore it is assumed that all of the students in each age group would attend the same school. The schools designated by LAUSD to serve the Project site are shown below and on Figure 45 on page 382:

Elementary School:

- 10th Street School, 1000 Grattan St., Los Angeles

Middle School:

- Berendo Middle School, 1157 S. Berendo St., Los Angeles

High School:

- Belmont High School, 1575 W. 2nd St., Los Angeles

The School Facilities Fee Plan, updated in March 2000, presents LAUSD methodology for forecasting student generation. The student generation rate (SGR) for new development is determined empirically, and is based on LAUSD enrollment of students who reside in housing constructed in the past five years. Different types of housing units have been found to have great disparity in generating students, therefore the housing type of a proposed development plays a key role in determining the number of students a project is anticipated to generate. The LAUSD has developed student generation rates for a variety of housing types (i.e., owner vs. renter, single-family vs. condominium vs. rental units and by the number of bedrooms within a unit) as well as income characteristics. As specifics regarding this level of detail is currently unknown for the Project's housing component, it is conservatively estimated, and for planning purposes only, that the Project's housing would be rental units and evenly split between two- and three-bedroom units. These assumptions were made as they reflect the types of housing which have the highest student generation rates and thus providing a conservatively high estimate of the students that would be

Figure 45 Project-Designated Schools
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generated by the Project. It is also reasonable to assume that the actual student generation from the Project would be less than that forecasted in this analysis due to potential that some of the housing units would be developed as condominiums and/or housing units with fewer bedrooms.

Utilizing the most recent SGRs for the LAUSD area, it is anticipated the new housing supply and employment associated with the Project will generate a total of 1,619 new students, consisting of 829 elementary school students, 333 middle school students, and 457 high school students.

Adding 829 new students to the 10th Street Elementary School's forecasted future enrollment of 1,880 would exceed the school's forecasted future capacity. There is not sufficient open space to provide a suitable amount of portable classrooms to accommodate the excess demand for classroom facilities, and therefore the additional students would be considered a significant impact. It is important to note that the capacity of the 10th Street Elementary School would be exceeded prior to the addition of any Project students.

Adding 333 new students to the Berendo Middle School's forecasted future enrollment of 4,550 would exceed the school's forecasted future capacity. There is not sufficient open space to provide a suitable amount of portable classrooms to accommodate the excess demand for classroom facilities, and therefore the additional students would be considered a significant impact. It is important to note that the capacity of Berendo Middle School would be exceeded prior to the addition of any Project students.

Adding 457 new students to the Belmont High School's forecasted future enrollment of 7,680 would exceed the school's forecasted future capacity. There is not sufficient open space to provide a suitable amount of portable classrooms to accommodate the excess demand for classroom facilities, and therefore the additional students would be considered a significant impact. It is important to note that the capacity of Belmont High School would be exceeded prior to the addition of any Project students.

(4) LAUSD Fees for Commercial and Residential Construction

Development fees payable to the LAUSD are calculated by applying the maximum construction fees specified by the State Allocation Board, \$2.05 per square foot of residential construction and \$0.33 per square foot of commercial construction.

c. MITIGATION MEASURES

SB 50 states that the maximum fee amounts allowed by the bill are "deemed to provide full and complete school facilities mitigation" for purposes of CEQA. No further mitigation beyond the fees described in Section b.(4), above, are required or recommended.

d. ADVERSE EFFECTS

The Project does/does not generate students in excess of the forecasted capacity of schools designated to serve the Project site. This significant impact is fully mitigated to a less than significant level by payment of development fees to LAUSD.

e. CUMULATIVE IMPACTS

As shown in Table 47 on page 385, the Project is anticipated to directly generate 1,619 new students within LAUSD's service area. Related residential projects (see Section III. B, Cumulative Development, for a comprehensive list of related projects) are scheduled to add an additional 1,303 housing units, which are projected to generate an additional 508 students residing within LAUSD's service area.

A total of 13,047 new jobs are estimated to be created by related commercial projects, as shown in Section III. B. Using LAUSD's student generation parameters, related projects are estimated to generate an additional 2,540 new students in the LAUSD service area by 2008.

Any significant impacts on the demand for schools within LAUSD attributable to residential construction are considered mitigated by the development fees payable to LAUSD.

Table 47

ESTIMATED STUDENT GENERATED BY THE PROJECT

A. Housing

School Level	Student Generation Rates for Apartments		Number of Proposed Housing Units		Forecasted Student Generation		
	Two-Bedroom	Three Bedroom	Two-Bedroom	Three Bedroom	Two-Bedroom	Three Bedroom	Total
Elementary	0.22	0.52	400	400	88	208	296
Middle	0.10	0.20	400	400	40	80	120
High	0.14	0.27	400	400	56	108	164
Total					184	396	580

B. Employment

School Level	Student Generation Rate	Project Employment	Forecasted Student Generation
Elementary	0.20	5,343	533
Middle	0.08	5,343	213
High	0.11	5,343	293
Total			1,039

C. Total Student Generation

School Level	Residential	Employment	Total
Elementary	296	533	829
Middle	120	213	333
High	164	293	457
Total	580	1,039	1,619

Source: LAUSD Student Generation Rates applied to Project characteristics.

IV. ENVIRONMENTAL IMPACT ANALYSIS

I. PUBLIC SERVICES

4. PARKS AND RECREATION

a. ENVIRONMENTAL SETTING

The City of Los Angeles Department of Recreation and Parks maintains and operates more than 375 sites for recreational use. The Department operates 123 recreation centers, 58 swimming pools, seven lakes, seven camps both in and out of town, 13 golf courses, more than a dozen museums and historic sites, and hundreds of programs for youth, seniors, the physically disabled and volunteers. The Department administers more than 15,600 acres of parkland, including 4,217 acres in Griffith Park, one of the largest municipal parks within the boundaries of an American city. Other large parks in the City of Los Angeles are Elysian Park and Exposition Park, which are close to downtown, MacArthur Park, Echo Park and Harbor Regional Park in Harbor City.⁷⁷

The City's *General Plan Framework* sets forth a citywide comprehensive long-range growth strategy and defines and identifies policies that will be implemented through subsequent amendments of the City's community plans, zoning ordinance, and other pertinent programs. Parks are also noted as an essential component of the greater urban forest infrastructure. One of the primary recreation and parks goals is to provide sufficient and accessible parkland and recreational opportunities in every neighborhood of the City that would give all residents the opportunity to enjoy green spaces, athletic activities, social activities, and passive recreation. The corresponding objective for achieving this goal is to monitor and forecast demand for existing and projected recreation and park facilities and programs. Policy 9.23.5 of the *General Plan Framework* states that the City shall re-evaluate the current park standards and develop modified standards which recognize urban parks, including multi-level facilities, smaller sites, more intense use of land, public/private partnerships and so on.⁷⁸

The *Public Recreation Plan*, Section 1, which is a portion of the *Service Systems Element* of the *City of Los Angeles General Plan*, provides guidelines for neighborhood and community recreation sites, community buildings, gymnasiums, swimming pools, and tennis courts. The *Public Recreation Plan* sets forth recreational standards for satisfying the needs of neighborhood and community recreational sites. The objectives of *Public Recreation Plan* are based on recognized planning principles and the extent and nature of deficiencies in the City's recreational facilities.

⁷⁷ City of Los Angeles Department of Parks and Recreation Website, <http://www.laparks.org/dept.htm>, October 6, 2000.

⁷⁸ *Los Angeles Citywide General Plan Framework*, July 1996.

The *Public Recreation Plan* also provides: 1) a guide for orderly development of the City's public recreational facilities; 2) long-range standards for use in connection with new subdivisions; 3) intensification of existing residential development or redevelopment of blighted residential areas as described under general local recreation standards; 4) developing and locating public facilities for the greatest number of people at the least cost and environmental impact; 5) priorities for the acquisition and development of public recreational facilities; and 6) refining and implementing goals and objectives set forth in the *Concept and Citywide Plan for Recreation*.⁷⁹

The *Public Recreation Plan* also categorizes City park sites as neighborhood, community, or regional. A neighborhood recreational site generally provides space and facilities for outdoor and indoor recreational activities. This type of park site is intended to serve residents of all ages within an immediate neighborhood. Facilities typically provided at these sites include the following activities: softball, basketball, volleyball, handball, soccer, football, shuffleboard, table games, handicrafts, lawn games, and small children play area. These sites generally provide, at a minimum, two acres per 1,000 persons and have a service radius of approximately 0.5 mile. The minimum desirable acreage for this type of site is five acres.

A community recreational site is designed to serve residents of all ages in several surrounding neighborhoods. These facilities serve a much wider interest range than do those of a neighborhood site. A typical community recreational site offers recreational amenities such as baseball diamonds, combined football and soccer fields, tennis and handball courts, a swimming pool, or other community recreational uses. These sites provide a minimum two acres per 1,000 persons and serve a radius of approximately two miles. The minimum desirable acreage for this type of park site is 15 acres. A regional park site is generally over 50 acres and usually provides specialized recreational facilities such as lakes, golf courses, campgrounds, wilderness areas, and museums. These sites normally serve regional areas within the Los Angeles Basin and may include or emphasize exceptional scenic attractions. These park sites also contain similar facilities provided in neighborhood and community recreational sites.⁸⁰ Neighborhood and community recreational sites should each be provided at a minimum of two acres per 1,000 persons. The Local recreation standards are long range and may not be reached during the life of the City's *Public Recreation Plan*. Therefore, the following standards have been used for most of the adopted community plans and are included in the *Public Recreation Plan* as short and intermediate standards for future park acreage:

- For neighborhood parks – 1 acre per 1,000 persons; service radius of 1 mile

⁷⁹ *City of Los Angeles Public Recreation Plan, Section 1, October 1980.*

⁸⁰ *Ibid.*

- For community parks – 1 acre per 1,000 persons; service radius of 2 miles.⁸¹

The *General Plan Framework EIR* reveals that, based on the 0.5 mile service radius, the distribution and number of neighborhood parks are inadequate, particularly in the central San Fernando Valley, South Central Los Angeles, and Harbor Gateway. Most areas of the City are within the two-mile service radius of a community park except for the central portion of the San Fernando Valley and Harbor Gateway. Consequently, although virtually the entire City is covered by either a neighborhood or community park, there are two areas of the City that are not served by either of these park categories. Currently, the City does not have sufficient neighborhood and community parkland to meet the current population demand. Of the 11 City subregions, only the Metrocenter, Northeast Valley, and Southwest Valley subregions contain adequate acreage of regional parks to serve the local population. On a citywide scale, the City is deficient by 11,404 acres of neighborhood and community parkland, and 8,481 acres of regional parkland.⁸² Existing parks located in the *Central City Community Plan Area* include: neighborhood parks, such as Terrace Park, Toberman Playground, James Park, Grand Hope Park, 6th & Gladys Avenue Park, City Hall Park, Pershing Square, Macarthur Park, and Gilbert Lindsay Park; community parks like the Hoover Recreation Center and Central Library Park; and regional parks such as El Pueblo de Los Angeles, Exposition Park, and Echo Park. These parks are shown on Figure 46 on page 389.

Grand Hope Park, a passive neighborhood park located one block from the Project site, adjacent to the Fashion Design and Merchandising Institute (FIDM), occupies 2.3 acres south of 9th Street, between Hope and Grand Avenues. Grand Hope Park is the closest neighborhood park to the Project site and include amenities include benches, a walking path, a fountain, -and landscaping. This park is operated by a non-profit corporation affiliated with FIDM and is open to the public during daylight hours. Located adjacent to the Project site, Gilbert Lindsay Plaza is a 5-acre landscaped pedestrian plaza along Figueroa Street, immediately east of the Convention Center-West Hall and immediately south of STAPLES Center. This Plaza serves as a gathering place and an occasional picnic location for visitors to the Convention Center or STAPLES Center. However, it primarily serves as a pedestrian entry to the Convention Center-West Hall and as a staging and drop-off area for busses serving STAPLES Center and the Convention Center.

Pershing Square, a five-acre passive neighborhood park, is located approximately ½ mile northeast of the Project site. Approximately 500,000 people pass through Pershing Square Park per year. Pershing Square is accessed primarily by walking or by public transportation, although there is a multi-storied parking garage below the park. The Metro Red Line stops directly beneath Pershing Square and several bus lines run along adjacent streets. Pedestrians crisscross the park

⁸¹ *Ibid.*

⁸² *City of Los Angeles, Draft Environmental Impact Report, Los Angeles Citywide General Plan Framework, January 1995.*

Figure 46 City Parks in Proximity to Project Site

from all adjacent streets, including Olive Street, Hill Street, 5th Street, and 6th Street. In addition, there is a park-like setting located north of the Central Library on 5th Street, near Flower Street, that provides seating for resting and viewing.⁸³ The existing parkland deficiency for the *Central City Community Plan Area* is approximately 40 acres for neighborhood parks and approximately 40 acres for community parks. The Central Los Angeles Planning Area has a regional parkland deficiency estimated at approximately 880 acres.⁸⁴

Chapter 3, Article 10.5, Section 65560(b) of the California Government Code states that open space can be defined as any parcel, or area of land or water which is essentially unimproved and devoted to: preservation of natural resources, managed production of resources, outdoor recreation or public health and safety. According to the *Open Space and Conservation Element* of the City's *General Plan*, there are three categories of open space within the City: publicly owned open space; private, "open space"-designated lands; and vacant, non-"open space"-designated areas where open space characteristics should be protected. All lands zoned "A1", "A2" and "RA Suburban" are considered to be private open space lands under the *Open Space and Conservation Element* (but not under the adopted Open Space Ordinances). The *Open Space and Conservation Element* further states that at least 10 percent of all land area in the City should be park or open space land. However, in terms of State law, open space should only include those areas which are currently, or proposed to be, zoned as open space.⁸⁵ The Department of Recreation and Parks has established a planning standard of four acres of open space per 1,000 persons.

Other than neighborhood and community parks, major, publicly-owned open space in the City includes: the 650 acres of public beach; the remaining 210 acres of the Ballona Wetlands; the two natural lakes (six-acre Del Rey Lagoon and 40-acre Machado Lake); the Rio Hondo, San Gabriel and Los Angeles Rivers; Griffith Park; Sepulveda Dam Recreational Area; Hansen Dam Recreational Area; the Santa Monica Mountains National Recreation Area; and the Angeles National Forest. Landscaped medians along major highways, railroad right of ways, water reservoirs, and neighborhood storm channels are other valuable components of public open space.

Private, open-space designated lands are found primarily in the Tujunga Wash area and in the northwest San Fernando Valley. Major areas of remaining private, non-open space zoned lands within the City include parcels within the Santa Monica Recreation Area, portions of Playa Del Rey, Porter Ranch and Shadow Hills. Many of these areas have been identified by the City as areas where open space characteristics should be preserved. Currently, 24 of the City's 35 Community

⁸³ Correspondence received from Alonzo A. Carmichael, Planning Officer, City of Los Angeles Department of Recreation and Parks, October 3, 2000.

⁸⁴ *Ibid.*

⁸⁵ *Ibid.*

Planning Areas are currently lacking adequate open space zoned lands. The *Central City Community Plan* Area has a deficiency estimated at 216.4 acres.⁸⁶

Applicable parks and open space policies are also contained in the *Central City Community Plan*. The Project site is located within the South Park Area of the *Central City Community Plan*. The *Central City Community Plan* states that a regional park or park system is important to achieving the revitalization of the South Park Planning Area. Ample open space and recreation areas should be provided. The provision of housing and open space is to be accomplished as a first priority. Residential uses should be located adjacent to open space, with apartment buildings carefully placed to preserve their views.⁸⁷

The Quimby Act, *California Government Code* Section 66477, allows the legislative body of a city or county, by ordinance, to require the dedication of land or impose a requirement of the payment of fees in lieu thereof, or a combination of both, for park and recreational purposes as a condition to the approval of a tentative map or parcel map.

As provided in the *City of Los Angeles Municipal Code*, Section 17.12, Park and Recreation Site Acquisition and Development Provisions, no final subdivision map shall be approved nor shall it be recorded unless, in connection therewith, land within the subdivision has been dedicated to the City of Los Angeles for park and recreational purposes, as may be determined by the advisory agency in accordance with the standards and in the manner set forth, or a fee in lieu thereof has been paid or guaranteed to be paid within one year after the City Council approves the final map, or a combination of dedication and payment or guarantee of fees has occurred. The guarantee of payment of fees is to be to the satisfaction of the Department of Recreation and Parks. The lands required to be dedicated and the fees required to be paid pursuant to this section in connection with a particular subdivision may be used only for the purpose of providing park or recreational sites and facilities which will serve such subdivision and the future residents therein. Such sites and facilities shall comply with the principles and standards set forth in the Recreational Element of the *General Plan*, and the location of land to be dedicated shall bear a reasonable relationship to the use of the proposed park and recreational facilities by future inhabitants of the subdivision.⁸⁸

b. PROJECT IMPACT

(1) Significance Thresholds/Methodologies

A significant impact to parks and recreation would occur if, based upon the service standards established by the City, the following resulted: (1) Project development would exceed the capacity

⁸⁶ *Ibid.*

⁸⁷ *Los Angeles Central City Community Plan*, April 1989.

⁸⁸ *City of Los Angeles Municipal Code*, July 2000.

of a park or recreational facility, which currently adequately serves the existing population, or (2) project development substantially increases the demand for park and recreational facilities for which current demand exceeds the ability of a facility to adequately serve the population.

(2) Analysis of Project Impacts

(a) Construction

Implementation of the proposed Project is not anticipated to result in construction-related impacts to parks and recreational facilities. Construction workers are highly transient in their work location and would not likely utilize off-site park and recreational facilities in proximity to a job site. Further, Project construction is not anticipated to result in significant impacts to existing parks and recreational facilities identified above due to the distance between these facilities and the Project site.

(b) Operation

The existing parkland deficiency for the *Central City Community Plan Area* is approximately 40 acres for neighborhood parks and approximately 40 acres for community parks. The Central Los Angeles Planning Area has a regional parkland deficiency estimated at approximately 880 acres. By 2010, the parkland deficiency for the *Central City Community Plan Area* is estimated to be approximately 50 acres for neighborhood parks and approximately 50 acres for community parks. It is also estimated that the Central Los Angeles Planning Area shall have a regional parkland deficiency estimated at 1,127 acres by 2010.⁸⁹ The development of 800 new dwelling units within the proposed Project would add an estimated 2,272 residents to the South Park Area, resulting in the increased use of existing neighborhood, community and regional parks in the *Central City Community Plan Area*, where parkland deficiencies have been identified. Therefore, the proposed Project would result in a potentially significant impact to the delivery of parks and recreation services. A mitigation measure has been included to reduce this potentially significant impact to a level of less than significant.

The proposed Project is based on design concepts which emphasize pedestrian utilization of integrated land uses that features plazas and paseos that extend the urban grid internally and that promote use by patrons, guests and residents of the Project. This open and connective pedestrian realm would emphasize the project's public character. This atmosphere is most clearly demonstrated in the design of the central plaza that will function as a major gathering place linking STAPLES Center and the Convention Center with the proposed convention hotel and entertainment uses across and along 11th and Figueroa Streets. Situated where pedestrian traffic from all uses

⁸⁹ City of Los Angeles, *Draft Environmental Impact Report, Los Angeles Citywide General Plan Framework*, January 1995.

converge, the central plaza would provide a unique identity for the district, and is intended for use by a wide variety of gatherings and special events. The proposed Project would also feature an extensive streetscape element that would utilize a hierarchy of private open spaces that includes entry forecourts, paseos, plazas/courtyards, and roofscapes, in addition to the central plaza. As shown on page 395, all of these on-site open space areas would be accessible to the public on a limited basis, providing a total of approximately 6.9 acres of active and passive open space. In addition to the open space areas described above, the proposed Project includes a redesign of 11th Street between Figueroa and Georgia Streets to be closed during non-peak periods. Eleventh Street would function as an extension of the central plaza to provide increased pedestrian circulation areas during special events. Enhanced streetscape linkages to the north, south, and east would also serve to emphasize Figueroa Street as an important pedestrian corridor linking the Project with the existing community.

The *Central City Community Plan Area* has an existing open space zoned lands deficiency estimated at 216.4 acres. This open space deficiency is anticipated to become worse in the future. As part of the proposed project, 800 dwelling units would be developed. This would increase the density of the area by an estimated 2,272 people. The Project would satisfy the open space requirements as dictated in the City's Municipal Code for multi-family dwellings.⁹⁰ The open space provided by the Project would be landscaped in accordance with a landscape plan approved by the City's Department of Planning.⁹¹ However, the Department of Recreation and Parks has also stated that in-lieu park fees (i.e., Quimby Act) that are assessed to the proposed Project would not meet the demand for open space considering the value of real estate in the downtown area.⁹² However, due to the proposed Project's design features and intent, it would be infeasible to dedicate additional acreage for parks and/or open space. Therefore, the proposed Project would result in a potentially significant impact by creating an unusual hardship to provide open space.

c. MITIGATION MEASURES

In order to mitigate the proposed Project's impacts on the Central City area's existing and future deficiency of parkland and open space, the following mitigation measures are recommended:

⁹⁰ *City of Los Angeles Municipal Code, Sections 12.11C and 12.21G, July 2000.*

⁹¹ *Correspondence received from Alonzo A. Carmichael, Planning Officer, City of Los Angeles Department of Recreation and Parks, October 3, 2000. The Department projects future population at a rate of 3.0 persons per household on a citywide basis. The 1990 Census indicates that the average household size for dwelling units within one mile of the Project site is 2.84 persons per household. (Refer to Section IV.C., Population, Housing and Employment, of this Draft EIR.*

⁹² *Correspondence received from Alonzo A. Carmichael, Planning Officer, City of Los Angeles Department of Recreation and Parks, October 3, 2000.*

1. The Project shall incorporate project design features such as plazas, terraces and paseos that encourage access to a variety of open space uses for residents and visitors to the Project site (see Figure 47 on page 395).
2. The Applicant shall pay required fees to the City of Los Angeles Recreation and Parks Department for the purpose of providing future parks and open space in the Central City area, subject to a credit for publically available open space uses provided by the project.

d. ADVERSE EFFECTS

The Project would satisfy the open space requirements of the City's Municipal Code for multi-family housing. However, the Project would not meet the Department of Recreation and Parks planning standard of four acres per 1,000 residents. Therefore, the Project would have a significant impact on parks and recreation facilities.

e. CUMULATIVE IMPACTS

The proposed Project, in combination with related projects and background growth, would result in an increased demand for parks and recreational facilities. Related projects would be required to dedicate parkland/open space and/or pay in-lieu fees as mitigation, per the requirements of the City of Los Angeles Municipal Code, the City of Los Angeles *Public Recreation Plan*, and the requirements of the City of Los Angeles Department of Recreation and Parks. However, payment of in-lieu fees may not meet the demand for open space considering the value of real estate in the downtown area. Therefore, impacts to parks and recreational facilities would be cumulatively significant.

Figure 47 On-Site Open Space Areas