

IV. ENVIRONMENTAL IMPACT ANALYSIS
M. PUBLIC SERVICES
1. FIRE PROTECTION

ENVIRONMENTAL SETTING

Fire prevention, fire suppression, and life safety services in the City of Los Angeles are provided by the City of Los Angeles Fire Department (LAFD), as governed by the Fire Protection and Prevention Plan (Fire Plan), an element of the City’s General Plan, as well as the Fire Code in the Los Angeles Municipal Code. The Fire Plan 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. The LAFD has 3,832 uniformed personnel and 333 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 1,038 firefighters (including 172 paramedic-trained personnel) are on duty at all times at 103 neighborhood fire stations located across the LAFD’s 471-square-mile jurisdiction.¹ Existing fire stations that currently serve the project site are listed in Table IV.M-1, below (see also Figure IV.M.1-1 for the locations of these fire stations).

Table IV.M-1
Existing Fire Stations Serving Project Site

Station No.	Location	Equipment	Distance to Project Site (miles)
92	10556 W, Pico Boulevard ^a	<ul style="list-style-type: none"> • Task Force Truck and Engine Company • Paramedic Rescue Ambulance • Staff of 12 	1.3
58	1556 S. Robertson Boulevard	<ul style="list-style-type: none"> • Task Force Truck and Engine Company • Staff of 10 	2.1
37	1090 Veteran Avenue	<ul style="list-style-type: none"> • Task Force Truck and Engine Company • Battalion 9 Headquarters • Staff of 13 	2.3

^a The written correspondence from the Los Angeles Fire Department incorrectly states that the location of Fire Station 92 is 1819 W. 7th Street (see Appendix B).

Source: Written correspondence from William R. Bamattre, Fire Chief, City of Los Angeles Fire Department, September 21, 2005; and Christopher A. Joseph & Associates, August 2005.

¹ Los Angeles Fire Department, website: <http://www.lafd.org/about.htm>, August 2005.

Fire Flows

In general, the required water flow is closely related to land use as the quantity of water necessary for fire protection varies with the type of development, life hazard, type and level of occupancy, and degree of fire hazard (based on such factors as building age or type of construction). City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In 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.

Water for fire flows for the area surrounding the project site is provided by the City of Los Angeles Department of Water and Power (LADWP). All water mains and lines that are designed and sized according to LADWP standards take into account fire flow and pressure requirements. Please refer to Section IV.O.2 (Water Supply) for a discussion of water service infrastructure in the project area.

Response Distance and Access

Response distance relates directly to the linear travel distance (i.e., miles between a station and a site) and the LAFD's ability to successfully navigate the given accessways and adjunct circulation system. Roadway congestion and intersection Level of Service along the response route can affect the response distance when viewed in terms of travel time. The Fire Code specifies the maximum response distances recommended between specific sites and the nearest fire station, based upon land use and fire flow requirements. 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; while for a commercial land use, the distance is one mile for an Engine Company and 1.5 miles for a Truck Company. When response distances exceed these recommendations, all structures must be equipped with automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems, etc.).

Figure IV.M-1, Fire and Police Station Locations

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with 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 Draft 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.

Project Impacts

Short-Term Construction Impacts

Removal of the existing hotel building and construction of the proposed project would increase the potential for accidental onsite fires from such sources as the operation of mechanical equipment, use of flammable construction materials, and from carelessly discarded cigarettes. In most cases, the implementation of “good housekeeping” procedures by the construction contractors and the work crews would minimize these hazards. Good housekeeping procedures that would be implemented during demolition and 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.

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. These impacts, while potentially adverse, are considered to be less than significant for the following reasons:

- (1) Construction impacts are temporary in nature and do not cause lasting effects; and
- (2) 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.

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, construction-related impacts to fire protection services would be less than significant.

Long-Term Operational Impacts

As discussed in Section IV.L (Population and Housing), the proposed project would introduce approximately 392 residents and 202 fewer employees to the project site. However, the total number of visitors (i.e., non-residents and non-employees) to the proposed project on a daily basis is anticipated to be less than that associated with the hotel. It is estimated that the average daily number of hotel guests is approximately 334 persons (297 rooms x 1.5 persons per room x 70% occupancy). In addition, the visitors to the project site associated with the restaurant and banquet facilities of the hotel are not included in this analysis and, as a result, the estimated total number of persons on the project site on a daily basis represents a conservative estimate. As such, implementation of the proposed project would likely decrease the number of site visitors (i.e., at the proposed residences and retail shops) within the project site. This decrease in residents, employees, and site visitors would not generate an increase in the demand for fire protection services. The following discussion analyzes the major criteria for determining the proposed project's impacts to fire protection services, including response distance, emergency access/evacuation, and fire flows.

Fire Flows

As determined by the LAFD, the overall fire flow requirement for the proposed project is 12,000 gpm from any block fire hydrants flowing simultaneously with a 20 PSI minimum residual pressure.² Currently, water pressure and availability in the project are expected to be sufficient to meet the existing LAFD's fire flow requirements.³ For a complete discussion of the proposed project's provision of water service for fire flows and domestic purposes, refer to Section IV.O.2 (Water Supply).

The Water Operations Division of the DWP 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.

Therefore, with respect to fire flows, fire protection would be adequate.

Response Distance

As shown in Table IV.M-1, the project site is within a 1.3 mile radius of one LAFD fire station housing both an Engine and Truck Company, indicating that the project site is within the required fire protection distance for both the proposed residential and commercial uses. Furthermore, the project site is within approximately two miles of two additional fire stations that house both an Engine and Truck Company,

² Written correspondence from William R. Bamattre, Fire Chief, City of Los Angeles Fire Department, September 21, 2005.

³ Written correspondence from Charles C. Holloway, Supervisor of Environmental Assessment, Los Angeles Department of Water and Power, August 9, 2005.

which could provide supplemental fire protection services. Therefore, with respect to response distance from existing fire stations to the project site, fire protection would be adequate.

Emergency Access

As discussed further in Section IV.N (Transportation and Traffic) of this Draft EIR, with the implementation of the Mitigation Measures N-1 and N-2, traffic impacts during operation of the proposed project would not result in a significant impact on any nearby roadways or intersections, which could thereby impede 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 or would interfere with an adopted emergency response or evacuation plan. Furthermore, the LAFD has made recommendations to ensure that emergency access to the project site would be sufficient and, thus, would not require the construction or expansion of fire stations or other fire protection facilities.⁴ These recommendations are listed in Mitigation Measures M.1-1 through M.1-10 at the end of this Section.

LAFD Review

Based on the existing staffing levels, equipment, facilities, and most importantly, response distance from existing stations, it is expected that the LAFD could accommodate the proposed project's demand for fire protection service.⁵ Therefore, the proposed project would not necessitate the construction or expansion of a fire station to maintain acceptable service ratios, response times, or other performance objectives of the LAFD, and a less-than-significant impact would occur.

CUMULATIVE IMPACTS

The proposed project, in combination with the construction and operation of the 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 be funded via existing mechanisms (i.e., property taxes, government funding), to which the proposed project and related projects would contribute.

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 LAFD 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

⁴ Written correspondence from William R. Bamattre, Fire Chief, City of Los Angeles Fire Department, September 21, 2005.

⁵ *Ibid.*

Company, LAMC Section 57.09.07 would require the installation of automatic fire sprinkler systems, in order to compensate for the additional response distance. At present there are no specific plans to build a new fire station, the construction of which could cause significant environmental impacts. Therefore, the proposed project would not have a cumulatively considerable incremental effect upon fire protection services and the proposed project's cumulative impact would be less than significant.

MITIGATION MEASURES

Although the proposed project would not have a significant impact on fire protection services, the following mitigation measures are recommended to further reduce the proposed project's less-than-significant impact on fire protection services:

- (M.1-1) During demolition, the Fire Department access shall remain clear and unobstructed.
- (M.1-2) Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.
- (M.1-3) The width of private roadways for general access use and fire lanes shall not be less than 20 feet clear to the sky.
- (M.1-4) Fire lanes, where required and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.
- (M.1-5) Where access for a given development requires accommodation of Fire Department apparatus, minimum outside radius of the 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.
- (M.1-6) No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along the path of travel, except for dwelling units, where the travel distance shall be computed to the front door of the unit.
- (M.1-7) No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
- (M.1-8) Access for Fire Department apparatus and personnel to and into all structures shall be required.
- (M.1-9) At areas designated by the Fire Department, the structural system shall be demonstrated, by engineering calculations, as capable of sustaining Fire Department vehicle loads. The design methodology shall conform to the latest edition of the State of California Department of Transportation Bridge Design Specifications Manual.

- Basic design requirement (within the public right-of-way and for private roads, alleys, streets, etc.):

AASHTO HS20-44 with the Impact Increment = 30%

- Special case for areas which are outside the public right-of-way, not a road and restricted to passenger vehicles only:

AASHTO HS15-44 with Impact Increment = 30%

(M.1-10) The proposed project shall comply with all applicable State and local codes and ordinances, and guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan for the City of Los Angeles C.P.C. 19708.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed project's impacts on fire protection services would be less than significant without mitigation. The implementation of the recommended mitigation measures would further reduce the proposed project's less-than-significant impacts.

IV. ENVIRONMENTAL IMPACT ANALYSIS

M. PUBLIC SERVICES

2. POLICE PROTECTION

ENVIRONMENTAL SETTING

The Los Angeles Police Department (LAPD) is the local law enforcement agency responsible for providing police services to the project site and the immediate project vicinity. The LAPD is divided into four Police Station Bureaus: Central Bureau, South Bureau, Valley Bureau, and West Bureau. The proposed project is located in the West Bureau. Each of the bureaus encompasses several community stations. The West Bureau includes the West Los Angeles Community Police Station, the Hollywood Community Police Station, the Wilshire Community Police Station, and the Pacific Community Police Station. The West Los Angeles Area Community Police Station located at 1663 Butler Avenue in the City of Los Angeles serves the project site area. The West Los Angeles Area Community Police Station encompasses approximately 65.14 square miles and 748 street miles, borders the cities of Beverly Hills, Culver City, Santa Monica, and Los Angeles County and the Pacific Ocean.⁶ The West Los Angeles Area Community Police Station Service Area is made up of multiple reporting districts. The project site falls within Reporting District (RD) 839, which is generally bounded by Santa Monica Boulevard to the north, Century Park East Drive to the east, Olympic Boulevard to the south, and Fox Hills Drive to the west.⁷

The West Los Angeles Area Community Police Station has 219 sworn police officers. According to the LAPD, the current residential population in the area served by the West Los Angeles Area Community Police Station is estimated at 232,323.⁸ According to the LAPD, there is currently one police officer for every 1,061 residents in the West Los Angeles area.⁹ Throughout the day, the business and residential population swells to approximately a half million people, due to those who attend education and professional institutes (e.g., UCLA) or work in/visit the neighborhoods of West Los Angeles, resulting in approximately one police officer for every 2,283 people physically present during the day within the West Los Angeles area.¹⁰

⁶ West Los Angeles Community Police Station, website: http://www.lapdonline.org/community/op_west_bureau/west_la_home_frame.htm, August 17, 2005.

⁷ Written correspondence, Captain James H. Cansler, Los Angeles Police Department, August 15, 2005.

⁸ Personal communication with Sergeant Garay, Los Angeles Police Department, August 24, 2005.

⁹ Written correspondence, William Bratton, Chief of Police, Los Angeles Police Department, August 15, 2005.

¹⁰ West Los Angeles Community Police Station, website: http://www.lapdonline.org/community/op_west_bureau/west_la_home_frame.htm, August 17, 2005.

Table IV.M-2 provides crime statistics for RD 839 and the West Los Angeles area as well as Citywide. In 2004, an estimated 7,008 crimes were reported in the West Los Angeles Police Station Service Area. The predominant crimes in the West Los Angeles Area Community Police Station Area were larceny and burglary. In 2004, an estimated 79 crimes were reported in RD 389. The predominant crimes in RD 839 were also larceny and burglary. The crime rate, which represents the number of crimes reported, affects the “needs” projection for staff and equipment for the LAPD. To some extent, 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 increases in land use activity.

Table IV.M-2
2004 Crime Statistics for RD 839, West Los Angeles Area, and Citywide

Type of Crime	No. of Crimes for RD 839	No. of Crimes for West Los Angeles Area	No. of Crimes Citywide
Homicide	0	9	525
Forcible Rape	3	31	1157
Aggravated Assault	11	529	27033
Robbery	10	379	14242
Burglary	24	1439	23243
Larceny	22	3840	72186
Vehicle Theft	9	781	30121
Total	79	7,008	168,507
<i>Source: Written correspondence, William Bratton, Chief of Police, Los Angeles Police Department, August 15, 2005.</i>			

Unlike fire protection services, police units are often in a mobile state; hence, actual distance between a headquarters facility and the project site is often of little relevance. Instead, the number of officers out on the street is more directly related to the realized response time. 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. Calls for police assistance are prioritized based on the nature of the call. The LAPD has a preferred response time or goal of seven minutes to emergency calls.¹¹ Response times are not broken down by RD; however, the average response time to emergency calls for service within the West Los Angeles Area Community Police Station Area during the period from June 26, 2005 to July 9, 2005 was 7.7 minutes.¹² The Citywide average within this same time period was 6.7 minutes.

¹¹ *Written correspondence, William Bratton, Chief of Police, Los Angeles Police Department, August 15, 2005.*

¹² *Ibid.*

The LAPD has stated that the West Los Angeles Area Community Police Station Area has an adequate number of officers to effectively serve the project area, including the project site.¹³

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with 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 Draft 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

Short-Term Construction Impacts

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. Most commonly, temporary fencing is 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. When such common sense precautions are taken, there is less need for local law enforcement at the construction site.

However, construction of the proposed project is not expected to cause significant congestion at the local study intersections (see Section IV.N, Transportation and Traffic, for further discussion). Although minor

¹³ *Ibid.*

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.

Therefore, the proposed project's construction-related impacts to police protection services would be less than significant.

Long-Term Operational Impacts

Implementation of the proposed project would result in an increase of site visitors, residents, and employees within the project site, thereby generating a potential increase in the level of police protection service calls from the project site. As discussed in Section IV.L (Population and Housing), the proposed project would introduce approximately 392 new residents and 202 fewer employees to the project site. However, the total number of visitors (i.e., non-residents and non-employees) to the proposed project on a daily basis is anticipated to be less than that associated with the hotel. It is estimated that the average daily number of hotel guests is approximately 334 persons (297 rooms x 1.5 persons per room x 70% occupancy). In addition, the visitors to the project site associated with the restaurant and banquet facilities of the hotel are not included in this analysis and, as a result, the estimated total number of persons on the project site on a daily basis represents a conservative estimate. As such, implementation of the proposed project would likely decrease the number of site visitors (i.e., at the proposed residences and retail shops) within the project site. This 154-person net decrease (392 – 202 – 344) in residents, employees, and site visitors would not generate any increase in the demand for police protection services.

While there is not a directly proportional relationship between increases in land use activity and increases in demand for police protection services, the number of request for assistance calls for police response to home and retail burglaries, vehicle burglaries, damage to vehicles, traffic-related incidents, and crimes against persons would be anticipated to decrease with the decrease in onsite activity and decreased traffic on adjacent streets and arterials. Such calls are typical of problems experienced in existing residential neighborhoods in the project area and do not represent unique law enforcement issues specific to the proposed project.

The proposed project would include adequate and strategically positioned functional and thematic lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security would be controlled to limit public access. The building and layout design of the proposed project would also include crime prevention features, such as nighttime security lighting, full-time onsite professional security, building security systems, and secure subterranean parking facilities. In addition, the continuous visible and non-visible presence of residents and employees at all times of the day would provide a sense of security during evening and early morning hours. The LAPD has stated that the West Los Angeles Area Community Police Station is staffed and equipped to provide full service to the West Los Angeles area, which includes the project site, and that the proposed project

would not result in the need for construction or expansion of police stations or other police protection facilities.¹⁴

With the buildout of the proposed project, the 154-person net decrease in persons at the project site on a daily basis would not require an increase in police protection services (i.e., additional officers and/or facilities) in order to maintain the current officer to civilian ratio. As previously stated, the current staff level of the existing West Los Angeles Area Community Police Station is adequate to effectively serve the project area, which includes the project site. As such, no new or expanded police stations would be needed as a result of the proposed project and there would be no long-term operational impacts to police protection services.

CUMULATIVE IMPACTS

The geographic context for cumulative analysis pertaining to police protection services entails the West Los Angeles Area Community Police Station service area, thus, only those related projects planned for the West Los Angeles area are included in this cumulative discussion. Of the 66 related projects identified in the related projects list (see Section II.B of this Draft EIR), 33 related projects are located within the West Los Angeles area and would be provided police protection service by LAPD.

The proposed project, in combination with ambient growth and the related projects, would increase the demand for police protection services in the project area. As discussed above, the proposed project is located within the West Los Angeles Area Community Police Station service area, which has an existing police service population of approximately 232,323 persons.¹⁵ By the year 2009, the police service population in the West Los Angeles area would be expected to increase by approximately 14,256 persons due to ambient growth.¹⁶ As shown in Table IV.M-3, the proposed project, combined with ambient growth and the 33 related projects, would result in a 49,073-person cumulative increase in the police service population in the West Los Angeles Area Community Police Station Service Area, of which the proposed project would comprise approximately one percent.

¹⁴ Written correspondence, Captain James H. Cansler, Los Angeles Police Department, August 15, 2005.

¹⁵ Personal communication with Sergeant Garay, Los Angeles Police Department, August 24, 2005.

¹⁶ Based on an ambient growth rate of 1.5 percent per year over four years, which would be the duration of project construction $(232,323 \times .015)^4 - 232,323 = 14,256$ person increase.

**Table IV.M-3
Estimated Cumulative Police Service Population**

No.	Land Use Type	Size	Population Conversion Factors^a	Total Police Service Population (persons)
32	Retail	11,085 sf	3 persons/1,000 sf	33
34	Condominiums	35 du	3 persons/unit	105
35	Apartments	19 du	3 persons/unit	57
36	2,000 Beds	2,000 beds	1 person/bed	2,000
	NW Phase II	296,700 sf	4 person/1,000 sf	1,187
	Physics & Astronomy Building	191,900 sf	4 person/1,000 sf	768
	Research Center, Thermal storage	95,000 sf	4 person/1,000 sf	380
	Nanosystems Institute	166,000 sf	4 person/1,000 sf	664
37	Health Center Replacement	1,710,000 sf	4 person/1,000 sf	6,840
	Theater	12,900 sf	3 persons/1,000 sf	39
38	Retail	15,000 sf	3 persons/1,000 sf	45
	Restaurant	2,993 sf	3 persons/1,000 sf	9
	Medical Office	74,000 sf	4 person/1,000 sf	296
	Theater	136,200 sf ^b	3 persons/1,000 sf	409
39	Retail	115,000 sf	3 persons/1,000 sf	345
40	Apartments	350 du	3 persons/unit	1050
	Office	937,000 sf	4 person/1,000 sf	3,748
41	Apartments	19 units	3 persons/unit	57
	Retail	6,100 sf	3 persons/1,000 sf	18
42	Condominiums	93 units	3 persons/unit	279
43	Condominiums	119 du	3 persons/unit	357
44	Gas station with Mart	-- ^c	-- ^c	0
45	Studio Expansion	360,000 sf	4 person/1,000 sf	1,440
46	High School Expansion	14,800 sf	4 person/1,000 sf	59
47	Office	508,600 sf	4 person/1,000 sf	2,034
48	Retail	71,000 sf	3 persons/1,000 sf	213
49	Condominiums	483 du	3 persons/unit	1,449
50	Office	791,000 sf	4 person/1,000 sf	3,164
52	Restaurant	32,023 sf	3 persons/1,000 sf	96
	Retail	19,214 sf	3 persons/1,000 sf	58
	Office	763,900 sf	4 person/1,000 sf	3,056
	Cultural	10,675 sf	4 person/1,000 sf	43
53	Private Middle School	122,000 sf	4 person/1,000 sf	488
54	Condominiums	65 du	3 persons/unit	195
	Assisted Living	181 du	3 persons/unit	543
	Retail	20,000 sf	3 persons/1,000 sf	60

Table IV.M-3 (Continued)
Estimated Cumulative Police Service Population

No.	Land Use Type	Size	Population Conversion Factors ^a	Total Police Service Population (persons)
62	Theater	280,800 sf ^b	3 persons/1,000 sf	842
	Shopping Center	723,466 sf	3 persons/1,000 sf	2,170
63	Apartments	36 du	3 persons/unit	108
	Retail	8,485 sf	3 persons/1,000 sf	25
64	Convenience Store	3,750 sf	3 persons/1,000 sf	11
65	Private School (9 th grade)	42,000 sf	4 person/1,000 sf	168
66	Hotel	42 rooms	1.5 person/room	63
Related Projects Total				34,971
Proposed Project Total				-154
Ambient Growth^d				14,256
Cumulative Total (Related Projects + Proposed Project + Ambient Growth)				49,073
<p><i>Notes:</i> du = dwelling unit; sf = square feet ^a Source: City of Los Angeles, Draft L.A. CEQA Thresholds Guide, May 14, 1998. Residential uses assumed to contain average of 2 bedrooms. ^b Calculated based on an average of 1 seat/120 sf of theater uses. ^c The amount of police protection services required by a gas station is unknown. However, the ambient growth factor would include nominal police protection services of land uses such as gas stations. Further, the impacts of related project (No. 44) would be individually evaluated under CEQA. ^d Ambient growth represents 1.5% of the West Los Angeles Area Community Police Station service area population through project buildout (2009).</p>				

The cumulative increase of 49,073 persons in terms of police service population would require approximately 47 additional officers to maintain the existing ratio of officers to civilians (49,417/1,061). It is possible that the additional 47 officers generated by the proposed project in combination with the related projects and ambient growth could be accommodated within the West Los Angeles Area Community Police Station. It is likely that over time a new or expanded police station would be needed to accommodate the 47 additional officers hired as a result of the cumulative growth. However, it is anticipated that any new or expanded police station would be subject to environmental review in accordance with CEQA and, as such, any potential environmental impacts would be addressed at that time.

Furthermore, 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 the proposed project would not incrementally contribute to the cumulative demand for police protection services, the proposed project would not have a cumulative police protection impact.

MITIGATION MEASURES

Although the proposed project would not have a significant construction-related impact on police protection services, the following mitigation measure is recommended to further reduce the proposed project's less-than-significant construction-related police protection impacts.

- (M.2-1) During construction activities, the project developer shall ensure that all onsite areas of active development, material and equipment storage, and vehicle staging, that are adjacent to existing public roadways, be secured to prevent trespass.

While the proposed project would not have a significant impact on police protection services following its buildout, the following mitigation measures are recommended to ensure that the LAPD's recommendations for the proposed project are addressed:

- (M.2-2) The project developer shall submit a plot plan for the proposed development to the LAPD's Crime Prevention Section for review and comment. Security features subsequently recommended by the LAPD shall be implemented, to the extent feasible.
- (M.2-3) The project homeowners' association(s) shall retain a single alarm and security patrol company to patrol the site and correct false alarms expeditiously.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed project's impacts on police protection services would be less than significant without mitigation. The implementation of the recommended mitigation measures would further reduce the proposed project's less-than-significant impacts.

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

ENVIRONMENTAL SETTING

Public schools in the City of Los Angeles are under the jurisdiction of the Los Angeles Unified School District (LAUSD). The LAUSD is divided into eight local districts. The project area is generally located within Local District 3, which encompasses most of the West Los Angeles area. The LAUSD schools that currently serve the project site include: Westwood Elementary (K-5) located at 2050 Selby Avenue; Emerson Middle (6-8) located at 1650 Selby Avenue; Webster Middle (6-8), located at 11330 West Graham Place; and Hamilton High (9-12) located at 2955 South Robertson Boulevard (see also Figure IV.M-2 for the locations of these schools). The 2004-2005 enrollments, enrollment capacities, and number of students above/below capacity for each of these schools are listed in Table IV.M-4, below.

Table IV.M-4
School Capacity and Enrollment

School	2004-2005 ^a Enrollment	Enrollment Capacity ^b	(-)Under/ (+)Over Capacity
Westwood Elementary	750	800	-50
Emerson Middle	1,548	1,589	-41
Webster Middle	1,356	1,631	-275
Hamilton High	2,030	3,380	-1,350
^a Los Angeles Unified School District, <i>Find a School</i> , website: http://notebook.lausd.net/schoolsearch/search.jsp , July 29, 2005. ^b Written correspondence from Glen Striegler, Environmental Assessment Coordinator, Office of Environmental Health and Safety, Los Angeles Unified School District, August 19, 2005. Source: Christopher A. Joseph & Associates, August 2005.			

As shown in Table IV. M-4, above, all of the public schools serving the project site are currently operating under capacity. There are no new elementary, middle, or high schools proposed by LAUSD in the project vicinity.¹⁷

¹⁷ Los Angeles Unified School District, *January 2005 Strategic Implementation Plan, Exhibit D*, website: <http://www.laschools.org/sep/sep-exhibit-d-project-list-by-district-opt.pdf>, July 29, 2005.

Figure IV.M-2, School and Library Locations

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 begins. Students living in a particular school’s attendance area are not displaced by a student requesting an open enrollment transfer to that school.¹⁸

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.¹⁹

The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project’s impacts on school facilities. The maximum fees authorized under SB 50 apply to 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 \$3.69 per square foot on new residential construction, \$0.34 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.²⁰

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with 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

¹⁸ News Release, Los Angeles Unified School District, Office of Communications, April 17, 2000.

¹⁹ Los Angeles Unified School District, School Facilities Fee Plan, March 2, 2002.

²⁰ Fax correspondence from Los Angeles Unified School District, Developer Fee Program Office, May 4, 2005. These rates are valid from October 23, 2004 to October 22, 2005 and are subject to change thereafter.

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.

Furthermore, as set forth in the City of Los Angeles Draft 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

Implementation of the proposed project would involve the development of 147 luxury residential condominium units and resident-only amenities, including a business center, screening room, gym, concierge services, valet parking, outdoor swimming pool, spa and deck, and garden. In addition to the residential amenities, the proposed project would incorporate additional amenities that include a 7,000 square foot restaurant and either (a) 27,000 square feet of specialty shops (i.e., shoe repair, salon, or art gallery) or (b) a 43,000-square-foot private club for project residents. For a conservative analysis, the proposed project is analyzed as developed with the 43,000-square-foot private club. Therefore, as shown in Table IV.M-5, a net increase of approximately three elementary students, two middle school students, and three high school students (approximately eight students total) would be generated by development of the proposed project.

**Table IV.M-5
Estimated Student Generation by the Proposed Project**

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total
Existing					
Hotel ^a	373,000 sf (297 rms)	3	1	1	5
Proposed					
Total Condominiums ^a	147 du				
Two-Bedroom	60 du	2	1	2	5
Three-Bedroom	76 du	3	2	2	7
Four-Bedroom	11 du	0	0	0	0
Private Club ^b	43,000 sf	1	0	0	1
Restaurant ^b	7,000 sf	0	0	0	0
Proposed Total		6	3	4	13
Less Existing Total		3	1	1	5
Net Proposed Total		3	2	3	8

Note: du=dwelling unit; sf=square feet; rm=room.

^a Student generation rates are as follows for hotel land uses: 0.0076 elementary, 0.0035 middle and 0.0034 high school students per 1,000 square feet. Los Angeles Unified School District, School District Fee Justification Study, September 2002.

^b Student generation rates are as follows for two-bedroom multi-family residential units: 0.026 elementary (K-5), 0.02 middle (6-8) and 0.027 high school (9-12) students per dwelling unit. Student generation rates are as follows for three- or more bedroom multi-family residential units: 0.043 elementary (K-5), 0.02 middle (6-8) and 0.027 high school (9-12) students per dwelling unit. Written correspondence from Mary Prichard, Senior Boundary Coordinator, Master Planning and Demographics, Los Angeles Unified School District, August 4, 2005.

^c Student generation rates are as follows for retail and service land uses: 0.0149 elementary, 0.0069 middle and 0.0067 high school students per 1,000 square feet. Los Angeles Unified School District, School District Fee Justification Study, September 2002.

Source: Christopher A. Joseph & Associates, August 2005.

As complete buildout of the proposed project would occur in 2009, the future enrollments at the schools serving the project site are provided based upon 2009 LAUSD school projections. Furthermore, while it is likely that some of the students generated by the proposed project would already reside in areas served by LAUSD and would already be enrolled in LAUSD schools, for a conservative analysis, it is assumed that all students generated by the proposed project would be new to LAUSD. The project site is located approximately equidistant from both Emerson and Webster Middle Schools. Therefore, for a conservative analysis, the two middle school students were split equally among these two middle schools. As shown in Table IV.M-6, with the exception of Westwood Elementary, all of the public schools serving the project site would have adequate capacity to accommodate the students generated by the proposed project.

**Table IV.M-6
Proposed Project Impacts on LAUSD Schools**

School	Enrollment Capacity^a	2009-2010 Enrollment^a	Project Generated Students	Future Enrollment with Project	(-)Under / (+)Over Capacity
Westwood Elementary	800	812	3	815	+15
Emerson Middle	1,589	1,110	1	1,111	-478
Webster Middle	1,631	1,181	1	1,182	-449
Hamilton High	3,380	2,716	2	2,718	-662

^a *Written correspondence from Glen Striegler, Environmental Assessment Coordinator, Office of Environmental Health and Safety, Los Angeles Unified School District, August 19, 2005.
Source: Christopher A. Joseph & Associates, August 2005.*

While the proposed project would slightly increase the enrollment of Westwood Elementary, which is expected to already be operating over capacity by the 2009-2010 school year, the proposed project's three elementary students would not be expected to generate the specific need for a new or expanded school. However, implementation of the mitigation measure identified below, requiring the mandatory payment of school fees in conformance with SB 50, would address the proposed project's impact on schools. Furthermore, in accordance with SB 50, payment of school fees is deemed to provide full and complete mitigation to impacts on schools pursuant CEQA.

CUMULATIVE IMPACTS

The proposed project, in combination with the related projects, is expected to result in a cumulative increase in the demand for school services. There are a total of 66 related projects. However, due to the various locations of the related projects and the local district boundaries determined by LAUSD, only 24 of the related projects would be located in the same LAUSD Local District as the proposed project (i.e., Local District 3).²¹ Furthermore, of these 24 related projects, four projects (i.e., related projects nos. 36, 46, 53, and 65) involve the development of either public or private schools.²² As such, only 20 related projects would have the potential to generate students that would attend the same schools as the proposed project (i.e., related projects nos. 34, 35, 37-45, 47-50, 52, 62-64, and 66). As shown in Table IV.M-7,

²¹ *Los Angeles Unified School District, Master Planning and Demographic Branch, Local Districts, website: http://notebook.lausd.net/pls/ptl/docs/PAGE/CA_LAUSD/LAUSDNET/DISCOVER/MAPS/LOCAL%20DISTRICTS.PDF, August 12, 2005.*

²² *Related Project No. 36 involves development on the UCLA campus; Related Projects Nos. 53 and 65 would involve the expansion/construction of private schools. Related Project No. 46 involves the expansion of the existing Hamilton High School at a location closer to the project site at 9760 Pico Boulevard, which would provide additional student capacity for the existing high school.*

these 20 related projects would generate approximately 208 elementary school students, 101 middle school students, and 118 high school students, for a total of 427 students.

**Table IV.M-7
Estimated Related Project Student Generation**

No.	Land Use	Size	Elementary School Students ^a	Middle School Students ^a	High School Students ^a	Total Students
34	Condominiums ^b	35 units	1	1	1	3
35	Apartments ^c	19 units	4	2	3	9
37	Theater ^d	106 seats (approx. 12,720 sf)	0	0	0	0
38	Retail ^d	15,000 sf	0	0	0	0
	Restaurant ^d	2,993 sf	0	0	0	0
	Medical Office ^e	74,000 sf	2	1	1	3
	Theater ^d	1,135 seats (approx. 136,200 sf)	2	1	1	4
39	Retail ^d	115,000 sf	2	1	1	3
	Apartments ^c	350 units	77	35	49	161
40	Office ^e	937,000 sf	22	10	10	42
41	Apartments ^c	19 units	4	2	3	9
	Retail ^d	6,100 sf	0	0	0	0
42	Condominiums ^b	93 units	2	2	3	7
43	Condominiums ^b	119 units	3	2	3	8
	Hotel ^f	Less 66 rms	0	0	0	0
44	Gas Station w/ Mart ^g	6 fueling positions	N/A	N/A	N/A	0
45	Studio Expansion ^d	360,000 sf	5	2	2	9
47	Office ^e	508,600 sf	12	5	0	17
48	Retail ^c	71,000 sf	1	0	0	1
49	Condominiums ^b	483 units	13	10	13	36
50	Office ^e	791,000 sf	18	9	8	35
52	Office ^e	763,900 sf	18	8	8	34
	Restaurant ^d	32,023 sf	0	0	0	0
	Retail ^d	19,214 sf	0	0	0	0
	Cultural ^d	10,675 sf	0	0	0	0
62	Theater ^d	2,340 seats (approx. 280,800 sf)	4	2	2	8
	Shopping Center ^d	723,466 sf	11	5	5	21
63	Apartments ^c	36 units	8	4	5	17
	Retail ^d	8,485 sf	0	0	0	0
64	Convenience Store ^d	3,750 sf	0	0	0	0

Table IV.M-7 (Continued)
Estimated Related Project Student Generation

No.	Land Use	Size	Elementary School Students ^a	Middle School Students ^a	High School Students ^a	Total Students
66	Hotel ^f	42 rms	0	0	0	0
Total Students			208	101	118	427

^a Unless specified otherwise, student generation rates provided by Los Angeles Unified School District, School District Fee Justification Study, September 2002.

^b Assuming all two-bedroom condominiums, student generation rates are as follows: 0.026 elementary (K-5), 0.02 middle (6-8) and 0.027 high school (9-12) students per dwelling unit. Written correspondence from Mary Prichard, Senior Boundary Coordinator, Master Planning and Demographics, Los Angeles Unified School District, August 4, 2005.

^c Assuming all two-bedroom apartments, student generation rates are as follows: 0.22 elementary (K-5), 0.1 middle (6-8) and 0.14 high school (9-12) students per dwelling unit. Written correspondence from Mary Prichard, Senior Boundary Coordinator, Master Planning and Demographics, Los Angeles Unified School District, August 4, 2005.

^d Student generation rates are as follows for retail/service uses: 0.0149 elementary, 0.0069 middle and 0.0067 high school students per 1,000 square feet. Theatre, restaurant, studio, cultural center, and shopping center uses are expected to fall in this category. Theatres estimated to provide 120 square feet per seat.

^e Student generation rates are as follows for office uses: 0.0233 elementary, 0.0108 middle and 0.0104 high school students per 1,000 square feet.

^f Student generation rates are as follows for hotel/motel uses: 0.0076 elementary, 0.0035 middle and 0.0034 high school students per 1,000 square feet.

^g No student generation rates were available for gas station uses; however, the number of students generated, if any, would be expected to be minimal.

Note: du=dwelling unit; sf=square feet; rm=room.
Source (related projects list): Overland Traffic Consultants, August 2005.
Source (table): Christopher A. Joseph & Associates, August 2005.

Similar to the proposed project, it is likely that some of the students generated by the related projects would already reside in areas served by the LAUSD and would already be enrolled in LAUSD schools. However, for a conservative analysis, it is assumed that all the students generated by the related projects would be new to the LAUSD.

As discussed above, the project site is located approximately equidistant from both Emerson and Webster Middle Schools. Therefore, for a conservative analysis, the 101 related project-generated middle school students were split equally among the Emerson and Webster Middle Schools.

Furthermore, as complete buildout of the proposed project would occur in 2009, the future enrollments at the schools serving the proposed project and related projects are provided based upon 2009 LAUSD school projections. As shown in Table IV.M-8, with the exception of Westwood Elementary School, all public schools that would serve the proposed project and the related projects would have adequate capacity to accommodate the cumulative student generation. Westwood Elementary School would already exceed its capacity in 2009-2010 school year and would further exceed its capacity with the cumulative student generation.

**Table IV.M-8
Cumulative Impacts to LAUSD Schools**

School	Enrollment Capacity ^a	2009-2010 Enrollment ^a	Cumulative Students		Future Enrollment with Cumulative Students	(-) Under/ (+) Over Capacity
			Proposed Project Students	Related Project Students		
Westwood Elementary	800	812	3	208	1,023	+223
Emerson Middle	1,589	1,110	1	51	1,162	-427
Webster Middle	1,631	1,181	1	51	1,233	-398
Hamilton High	3,380	2,716	3	118	2,837	-543

^a Written correspondence from Glen Striegler, Environmental Assessment Coordinator, Office of Environmental Health and Safety, Los Angeles Unified School District, August 19, 2005.
Source: Christopher A. Joseph & Associates, August 2005.

Because the elementary school which would serve the proposed project and the related projects would not have adequate capacity to accommodate the cumulative student generation, new or expanded elementary schools may be needed, which would result in a potentially significant cumulative impact. However, the proposed project would generate only three of the 211 (3 + 208) cumulative elementary school students. Therefore, as the proposed project would generate less than 0.02 percent of the total cumulative elementary school student generation, it would not be expected to contribute a considerable incremental increase to the number of students that would attend Westwood Elementary. With respect to the middle schools and high school that would serve the proposed project and related projects, Emerson Middle, Webster Middle, and Hamilton High would all have adequate capacity to accommodate the cumulative middle and high school students. Therefore, no new or expanded middle or high schools would be needed. Furthermore, similar to the proposed project, the applicants of the related commercial and residential projects would be expected to pay required developer school 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 these fees by the proposed project and the related projects would be mandatory, and would reduce the cumulative impact upon school services to a less-than-significant level.

MITIGATION MEASURE

The following mitigation measure is recommended to address any potential impacts to schools that may be associated with the proposed project:

- (M.3-1) The project applicant shall pay all applicable school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the project area.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed project's impact to schools would be reduced to a less-than-significant level with the implementation of the recommended mitigation measure.

IV. ENVIRONMENTAL IMPACT ANALYSIS

M. PUBLIC SERVICES

4. RECREATION AND 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 approximately 15,600 acres of parkland with 387 neighborhood and regional parks, seven lakes, 176 recreation centers, 372 children's play areas, 13 golf courses, 387 tennis courts, eight dog parks, 58 swimming pools, and seven skate parks, including those in the project vicinity.²³

The Public Recreation Plan, a portion of the Public Facilities and Service Systems Element of the City's General 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. The Public Recreation 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.

Within the West Los Angeles Community Plan Area (CPA), there are approximately 55 acres of park land, which includes four neighborhood parks (Irving Schachter Park, Club Circle, Ohio and Bundy Triangle, and Palms Park), three community parks (Cheviot Hills Park and Recreation Center, Felicia Manhood Senior Citizen Center, and Stoner Recreation Center), and one regional park (Rancho Park and Golf Course).²⁴ The CPA had a population of approximately 71,944 residents in 2000.²⁵ Therefore, the CPA currently provides approximately 19.1 percent of the 287.8 acres of parkland required using the City's standard [$55 / (71,944 \times 4/1,000)$].

As the project site is also served by parks and recreational facilities located outside the CPA and the City of Los Angeles, Table IV.M-9, below, includes those recreational facilities and parks that are located within an approximate two-mile radius of the project site (see also Figure IV.M-3 for park locations).

²³ Los Angeles Department of Recreation and Parks, Department, website: <http://www.laparks.org/dept.htm>, August 15, 2005.

²⁴ City of Los Angeles, Los Angeles Citywide General Plan Framework Draft Environmental Impact Report, January 19, 1995, Figure L-1, page 2.14-3.

²⁵ Los Angeles Department of City Planning, Statistical Information, website: <http://cityplanning.lacity.org>, August 17, 2005.

**Table IV.M-9
Parks and Recreational Facilities Serving the Project Site**

Facility	Location
Palms Recreation Center and Park	2950 Overland Avenue
Cheviot Hills Recreation Center	2551 Motor Avenue
Robertson Recreation Center	1641 Preuss Road
Irving Schachter Park	2599 Beverwil Drive
Roxbury Park ^a	471 S. Roxbury Drive
^a Located within the City of Beverly Hills. Source: City of Los Angeles Department of Parks and Recreation, Center Locator, website: http://gis.lacity.org/recandpark/recandpark.htm , August 16, 2005.	

The project site is located within a highly urbanized area and the current parkland to resident ratio for both the City of Los Angeles and the West Los Angeles CPA are well below the City's preferred standard.

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.

Furthermore, since the proposed project includes "for sale" units, the applicable provisions of Section 17.12 of the LAMC would also apply, requiring the project applicant to pay all applicable in lieu fees (Quimby fees) to the City of Los Angeles for the construction of condominium uses. To alleviate the demand on City parks and recreational facilities, the City requires developers of subdivisions to pay a public open space fee, as permitted under the Quimby Act. The Quimby Act allows California municipalities to require developers of new residential subdivisions to dedicate parkland or to pay fees in lieu of parkland dedication. In subdivisions containing more than 50 dwelling units, the City allows developers to dedicate parkland in lieu of paying fees (LAMC Section 17.12). The Quimby fees are used to acquire necessary land and/or develop new neighborhood and community parks or recreation facilities, which would reasonably serve each residential project.

Figure IV.M-3, Park and Recreation Center Locations

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with 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;
- (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 Draft 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

Development of the proposed project is anticipated to result in an increase of 392 permanent residents.²⁶ Employees of the proposed restaurant/commercial uses are less likely to patronize parks during working hours, and are more likely to use parks near their homes during non-work hours. Therefore, based on the

²⁶ As discussed in Section IV.L (Population and Housing), the proposed project would house approximately 392 residents total.

City General Plan ratio, the proposed project would generate a need for 1.57 (392 x 4/1,000) acres of public parkland in the project area.²⁷

The proposed project would integrate approximately two acres of landscaped open space available to project residents, including an outdoor swimming pool, spa and deck, and a private garden with barbecues, sitting areas, and walking paths. These recreational amenities fall within the LADRP recommendations that the proposed project include new park and/or recreational facilities onsite, such as a gym, a private garden with a sitting area and walking paths, and an outdoor swimming pool. The potential adverse impacts associated with the construction of these onsite facilities are addressed as part of the proposed project throughout this Draft EIR.

Overall, the proposed project would create approximately two acres of landscaped open space available to project residents. Although the proposed landscaped open space would not be open to the public, it may offset some of the project's demand for parkland. Based on this estimate, the proposed project is providing approximately 0.43 (2.0 – 1.57) more acres than the desired acreage of parkland, as determined by the City's ratio.

As stated above, the City requires developers of subdivisions to dedicate parkland or to pay fees in lieu of parkland dedication. If and to the extent the proposed onsite recreational and outdoor facilities do not fully satisfy the requirements of the Quimby Act, the project developer would be required to pay Quimby fees to the City, to satisfy the balance of its obligations under the Quimby Act. The provision of the onsite recreational and outdoor facilities, together with the payment of any required Quimby fees, would reduce the proposed project's impact upon parks and recreational facilities. Therefore, the proposed project would have a less-than-significant impact related to park and recreational facilities.

CUMULATIVE IMPACTS

The proposed project in combination with the related projects would be expected to increase the cumulative demand for parks and recreational facilities in the project area, including the City of Beverly Hills and the City of Los Angeles. Of the 66 related projects, 28 projects (i.e., related project nos. 2, 7, 13, 14, 19, 20, 22 through 31, 33 through 36, 39, 41 through 43, 49, 54, 57, and 63) would generate residents and, therefore, would combine with the proposed project to create a cumulative demand for parkland in the West Los Angeles and Beverly Hills communities. In general, the other 38 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.

²⁷ *As no population permanently resides at the former St. Regis Hotel, the operation of hotel does not contribute to the demand for parks and recreational facilities.*

The following park and recreational facilities would serve five of the related residential projects (i.e. related project nos. 23, 27, 28, 29, and 49), as well as the proposed project:

- Palms Recreation Center and Park, located at 2950 Overland Avenue;
- Cheviot Hills Recreation Center, located at 2551 Motor Avenue;
- Robertson Recreation Center, located at 1641 Preuss Road;
- Irving Schachter Park, located at 2599 Beverwil Drive; and
- Roxbury Park, located at 471 S. Roxbury Drive (in the City of Beverly Hills).

In addition, the following park and recreational facilities would serve the proposed project and related projects nos. 2, 7, 13, 14, 19, 20, 22, 24, 25, 26, 30, 31, 33, and 57 only: Cheviot Hills Recreation Center, Robertson Recreation Center, Irving Schachter Park, and Roxbury Park. The Cheviot Hills Recreation Center and Roxbury Park would serve the proposed project and related projects nos. 34 and 54 only. The Palms Recreation Center and Park, Cheviot Hills Recreation Center, and Roxbury Park would serve the proposed project and related project no. 42 only. Lastly, Palms Recreation Center and Park, Cheviot Hills Recreation Center, Irving Schachter Park, and Roxbury Park would serve the proposed project and related project no. 63 only.²⁸ As stated previously, the current parkland to residence ratio is below the standard set by the City. As shown in Table IV.M-10, below, the proposed project and the 25 residential related projects would result in a demand for approximately 12.20 acres of parkland and recreational facilities in the vicinity.

Table IV.M-10
Estimated Cumulative Parkland Demand

Related Project No.	Land Use Type	Size (du)	Residents	Parkland Demand (acres)^a
2 ^b	Condominiums	25	56	0.22
7 ^b	Condominiums	88	197	0.79
13 ^b	Condominiums	20	45	0.18
14 ^b	Apartments	37	83	0.33
19 ^b	Condominiums	20	45	0.18
20 ^b	Condominiums	16	36	0.14
22 ^b	Condominiums	80	179	0.72
23 ^b	Condominiums	11	25	0.10
24 ^b	Condominiums	9	20	0.08
25 ^b	Condominiums	11	25	0.10
26 ^b	Condominiums	38	85	0.34

²⁸ This excludes Related Project Nos. 36, 39, and 41 as they would not utilize any of the same parks as the proposed project.

Table IV.M-10 (Continued)
Estimated Cumulative Parkland Demand

Related Project No.	Land Use Type	Size (du)	Residents	Parkland Demand (acres)^a
27 ^b	Condominiums	13	29	0.12
28 ^b	Apartments	23	52	0.21
29 ^b	Condominiums	1	2	0.01
30 ^b	Condominiums	4	9	0.04
31 ^b	Condominiums	3	7	0.03
33 ^b	Condominiums	40	90	0.36
34 ^c	Condominiums	53	102	0.41
35 ^c	Apartments	35	67	0.27
42 ^c	Condominiums	93	179	0.72
43 ^c	Condominiums	119	228	0.91
49 ^d	Condominiums	483	223	0.89
54 ^e	Condominiums Assisted Living	65 181	159 443	0.64 1.77
57 ^b	Condominiums	88	197	0.79
63 ^c	Apartments	36	69	0.28
Related Projects Total		1,592	2,652	10.63
Proposed Project Total		147	392^f	1.57
Cumulative Total (Related Projects + Proposed Project)		1,739	3,044	12.20
^a	Based on a ratio of 4 acres per 1,000 residents or 0.004 acres/capita, assumed for both City of Los Angeles and City of Beverly Hills for consistency.			
^b	As related projects nos. 2, 7, 13, 14, 19, 20, 22 through 31, 33, and 57 are located within the City of Beverly Hills their number of residents is estimated using a ratio of 2.24 residents per dwelling unit. City of Beverly Hills, Departments and Offices, Community Development, Planning, Demographics, website: www.beverlyhills.org/presence/connect/CoBH/Homepage/Local+Government/Departments+and+Offices/Community+Development+-+Planning/LG-PL-Demographics , August 16, 2005.			
^c	As related project nos. 34, 35, 42, 43, and 63 are located within the Westwood Community Plan Area, the number of residents is estimated using a ratio of 1.92 residents per dwelling unit. Westwood Community Plan, July 27, 1999, page III-2.			
^d	As related project no. 49 is located within the West Los Angeles Community Plan Area, its number of residents is estimated using a ratio of 1.87 residents per dwelling unit. West Los Angeles Community Plan, July 27, 1999, page III-2.			
^e	As related project no. 54 is located within the Wilshire Community Plan Area, its number of residents is estimated using a ratio of 2.45 residents per dwelling unit. Wilshire Community Plan, September 19, 2001, page III-2.			
^f	As discussed in Section IV.1 (Population and Housing), the project applicant estimates the proposed project would house approximately 392 residents total.			

The development of the proposed project in combination with the 25 residential related projects would further decrease the City of Los Angeles' and the City of Beverly Hills' parkland to population ratio, which would result in a potentially significant impact. With respect to ambient growth, the extent of the service areas of the parks and recreational facilities that would serve the proposed project are not

geographically defined. Therefore, it is not possible to calculate ambient growth for the service population of the applicable parks and recreational facilities.

Although the proposed project would contribute approximately 13 percent to the cumulative demand, the proposed project would provide ample onsite open space and recreational opportunities. Therefore, the proposed project's incremental contribution would be less than considerable. Furthermore, similar to the proposed project, the related projects which are residential would be required to pay Quimby fees or other applicable parks and recreation fees, and/or to incorporate park and recreational facilities onsite. With the mandatory payment of the Quimby or other applicable fees by the residential related projects, cumulative parks and recreation impacts would be reduced. Therefore, the proposed project would not have a cumulatively considerable incremental effect on parks and recreational facilities, and the associated cumulative impact would be less than significant.

MITIGATION MEASURES

The proposed project would have a less-than-significant impact with respect to parks and recreational facilities. Therefore, no mitigation measures are recommended.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed project would have a less-than-significant impact with respect to parks and recreational facilities.

IV. ENVIRONMENTAL IMPACT ANALYSIS
M. PUBLIC SERVICES
5. LIBRARIES

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, an element of the City of Los Angeles 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.

The LAPL Branch Facilities Plan, adopted by the Board of Library Commissioners in August 1988 (revised in February 1998), 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.M-11.

Table IV.M-11
City of Los Angeles Public Library
Branch Building Size Standards

Population Served	Size of Facility
50,001 – 100,000	12,500 sf
35,001 – 50,000	10,500 sf
25,001 – 35,000	9,000 sf
Under 25,000	Special Size
<i>Notes:</i> <i>sf = square feet</i> <i>^a Source: Los Angeles Public Library Branch Facilities Plan, adopted 1988, revised 1998.</i>	

The State of California also has standards that apply to libraries. The State of California states that 0.5 square feet of library facility per capita should be provided.²⁹ In addition, the State of California standard for library volumes per capita is two per person.

Within the City of Los Angeles, the LAPL provides library services at the Central Library, seven regional branch libraries, 56 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.

²⁹ *City of Los Angeles, Los Angeles Citywide General Plan Framework Draft Environmental Impact Report, pages 2.13-1 & 2.13-2, January 1995.*

According to the Citywide General Plan Framework Draft EIR, libraries in the City of Los Angeles have a service area of two miles.³⁰ There are currently two libraries operating within a two-mile radius of the project site. Residents of the project area can utilize the following adjoining branch libraries:

- Westwood Branch Library at 1246 Glendon Avenue (opened May 7, 2005)
- Palms-Rancho Park Branch Library at 2920 Overland Avenue (opened November, 2002)

The Westwood Branch Library is located approximately 1.75 miles west of the project site, and the Palms-Rancho Park Branch is located approximately 1.5 miles south of the project site (see also Figure IV.M-2 for the locations of these libraries).

Please refer to Table IV.M-12 below for the facility and collection sizes, staffing, and total local community population served by these two libraries. These branch libraries serve the residential community, six days and two nights a week, and the retail/commercial community during the day.

Table IV.M-12
Libraries Serving the Proposed Project

Library	Size	Collection	Staff Positions	Total Library Service Population (persons)
Westwood Branch	12,500 sf	49,500	12	47,844
Palms-Rancho Park Branch	10,500 sf	46,300	12.25	46,300

Notes:
sf = square feet
^a *Source: Written correspondence from Rona Berns, Los Angeles Public Library, August 22, 2005.*

In November 1998, voters approved Proposition DD, which provides funds to replace, renovate, or expand 28 branch libraries, as well as build new branch libraries throughout the City. Regular funding for the operation of the LAPL system comes from the General Fund. The amount received by the LAPL fluctuates according to the priorities of the City.³¹ Construction of both branches was funded by Proposition DD. Both branch libraries adequately meet the current demand for library services from their respective communities.

³⁰ *City of Los Angeles, Los Angeles Citywide General Plan Framework Draft Environmental Impact Report, Figure L-1, page 2.13-8, January 1995.*

³¹ *Los Angeles Citywide General Plan Framework Draft Environmental Impact Report, 1996, page 2.12-12.*

ENVIRONMENTAL IMPACTS

Thresholds of Significance

In accordance with 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 Draft 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

Development of the proposed project would increase demand for library services by increasing the permanent residential population in the area by approximately 392 persons.³² In general, employees of commercial sites are not likely to patronize libraries during working hours, as they are more likely to use libraries near their homes during non-work hours. Therefore, based on the State of California standards, the proposed project would generate need for approximately 196 square feet (392 x 0.5) of library space and 784 (392 x 2) volumes of permanent collection.³³

Both the Westwood Branch Library and the Palms-Rancho Park Branch Library currently meet the demands of the surrounding community;³⁴ and, these libraries would have the ability to meet the additional library space demand of the proposed project. As the two libraries can accommodate up to

³² As discussed in Section IV.L (Population and Housing), the project applicant estimates the proposed project would house approximately 405 residents.

³³ As no population permanently resides at the former St. Regis Hotel, the operation of hotel does not contribute to the demand for library facilities.

³⁴ Written correspondence from Rona Berns, Los Angeles Public Library, Library Facilities Division, August 22, 2005.

150,000 persons with their combined 23,000 square feet of library space (see Table IV.M-11) and as the two libraries only currently serve 94,144 persons (see Table IV.M-12), the library space in these two libraries would be able to accommodate the library space demands of the additional 392 project residents. Therefore, the proposed project would result in a less-than-significant library facilities impact.

CUMULATIVE IMPACTS

The geographic context for cumulative analysis pertaining to library services entails the Westwood Branch Library and Palms-Rancho Park Branch Library service areas, thus, only those related projects planned for areas within the City of Los Angeles within two miles of either of these two libraries are included in this cumulative discussion. Of the 66 related projects identified in the related projects list (see Section II.B of this Draft EIR), 33 related projects are located within the service areas of these two libraries and would be provided library service by LAPL.

The proposed project, in combination with ambient growth and the related projects, would increase the demand for library facilities in the project area. The libraries that would serve the 33 related projects would serve the proposed project, because their library service areas overlap with the proposed project's library service area. Thus, the related projects would introduce new residents that would increase the demand for library services. In general, the related projects would generate employees and/or students, who would not be expected to patronize local libraries to a great extent, as they typically would not have long periods of time during their work or school days to visit library facilities and would be more likely to use libraries near their homes during non-work or non-school hours. Thus, of the 33 related projects that would be served by the Westwood and Palms-Rancho Park Branch Libraries, only the nine residential related projects are utilized for this cumulative analysis. It should also be noted that the largest resident-generating residential project, related project no. 36, is located on the UCLA campus, and such student-residents would be anticipated to utilize on-campus libraries rather than LAPL facilities.

Furthermore, to accommodate for the ambient growth in the library service population in the project area, the 94,144 persons that are currently served by the Westwood and Palms-Rancho Park Branch Libraries were increased by a growth factor of 1.5 percent per year over four years. This would result in an additional 5,777 persons requiring library services from these two libraries by 2009 (year of proposed project buildout).³⁵

As shown in Table IV.M-13, the proposed project, in combination with the nine residential related projects and ambient growth, would result in a cumulative increase of 11,003 residents who would demand library service. Therefore, based on the State of California standards, the proposed project, ambient growth, and related projects would generate an additional need for approximately 5,501.5 square feet of library space and 22,006 volumes of permanent collection.

³⁵ Based on an ambient growth rate of 1.5 percent per year over four years.

**Table IV.I-13
Cumulative Library Space and Volume Demand**

No.	Land Use Type	Size (du)	Residents	Library Space Demand (sf) ^a	Library Volume Demand ^b
34	Condominiums	35 du	68 ^c	34	136
35	Apartments	19 du	37 ^c	18.5	74
36	2,000 Beds	2,000 beds	2,000	1,000	4,000
	Apartments	350 du	676 ^c	338	1,352
41	Apartments	19 units	37 ^c	18.5	74
42	Condominiums	93 units	180 ^c	90	360
43	Condominiums	119 du	230 ^c	115	460
49	Condominiums	483 du	913 ^d	456.5	1,826
54	Condominiums	65 du	165 ^e	82.5	330
	Assisted Living	181 du	458 ^e	229	916
63	Apartments	36 du	70 ^c	35	0
Related Projects Total		--	4,834	2,417	9,668
Proposed Project Total		--	392^f	196	784
Ambient Growth		--	5,777^g	2,888.5	11,554
Cumulative Total (Related Projects + Proposed Project + Ambient Growth)		--	11,003	5,501.5	22,006

^a Based on a ratio of 0.5 square feet per capita.

^b Based on a ratio of 2 volumes per capita.

^c As this related project is located within the Westwood Community Plan Area, its number of residents is estimated using a ratio of 1.93 residents per dwelling unit. Westwood Community Plan, July 27, 1999. As none of the related projects within the Westwood Community Plan Area include low-density residential uses, the highest estimated person-per-dwelling unit generation factor (1.93 persons per dwelling unit) among low medium, medium, and high medium residential densities was utilized for this calculation.

^d As this related project is located within the West Los Angeles Community Plan Area, its number of residents is estimated using a ratio of 1.89 residents per dwelling unit. West Los Angeles Community Plan, December 10, 1997. As none of the related projects within the West Los Angeles Community Plan Area include low-density residential uses, the highest estimated person-per-dwelling unit generation factor (1.89 persons per dwelling unit) among low medium, medium, and high medium residential densities was utilized for this calculation.

^e As this related project is located within the Wilshire Community Plan Area, its number of residents is estimated using a ratio of 2.53 residents per dwelling unit. Wilshire Community Plan, September 19, 2001. As none of the related projects within the Wilshire Community Plan Area include low-density residential uses, the highest estimated person-per-dwelling unit generation factor (2.53 persons per dwelling unit) among low medium, medium, and high medium residential densities was utilized for this calculation.

^f Based on Section IV.L, Population and Housing, Table IV.L-3.

^g Ambient growth represents 1.5% of the Westwood and Palms-Rancho Park Branch libraries service areas population through project buildout (2009).

Source: Christopher A. Joseph & Associates, August 2005.

Both the Westwood and Palms-Rancho Park Branch Libraries currently meet the demands of their surrounding communities, and these libraries would have the ability to meet the cumulative demand of the proposed project, the ambient growth, and the nine related residential projects in the vicinity.³⁶ As the two

³⁶ Written correspondence from Rona Berns, Los Angeles Public Library, Library Facilities Division, August 22, 2005.

libraries can accommodate up to 150,000 persons with their combined 23,000 square feet of library space (see Table IV.M-11) and as the two libraries only currently serve 94,144 persons (see Table IV.M-12), the library space in these two libraries would be able to accommodate the library space demands of the additional cumulative 11,003 residents. Therefore, the proposed project in combination with the related projects and ambient growth would result in a less-than-significant cumulative impact with regard to library facilities.

MITIGATION MEASURES

The proposed project would have a less-than-significant impact on library services. Therefore, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed project project's impact on library services would be less than significant.