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

This Subsection describes the potential impacts of the Project on fire protection services in the Project area. This Subsection’s analysis is based on the following correspondence with the City of Los Angeles Fire Department, which can be found in Appendix IV.I.1:

- City of Los Angeles Fire Department Response Letter, John Dallas, Inspector, Planning and Research Division, September 14, 2009.

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1. ENVIRONMENTAL SETTING

a. Existing Facilities

Fire prevention, fire suppression, and life safety services in the City of Los Angeles (the “City”) are provided by the City of Los Angeles Fire Department (LAFD). These activities are governed by the Fire Protection and Prevention Plan (FPPP), an Element of the City of Los Angeles General Plan (General Plan), as well as the City of Los Angeles Fire Code (the “Fire Code”) Section (Article 7 of Chapter V, Public Safety and Protection) of the Los Angeles Municipal Code (LAMC). The FPPP and Fire Code serve as guides to City departments, government offices, developers, and the public for the construction, maintenance, and operation of fire protection facilities as well as provision of fire protection services located within the City. 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 provisions, and emergency ambulance service.

The LAFD has 3,586 uniformed personnel and 353 non-uniformed professional support staff.\(^1\) Services of the LAFD include fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service. A professionally trained staff of 1,104 firefighters (including 242 paramedic-trained personnel) is on duty at all times at 106 neighborhood fire stations located across the LAFD’s 471 square-mile jurisdiction.\(^2\)

The Project Site is located within LAFD’s Division 1. Division 1 is further broken down into six Battalions (Battalions 1, 2, 5, 7, 9, and 11) and 33 neighborhood Fire Stations. The Project Site is located within LAFD’s Battalion 1 and is served by Fire Station 3, which is located 0.7 mile from the Project Site at 108 Fremont Avenue. Additional fire protection services are provided by Fire Station 9 and Fire Station 10, both of which are also part of Battalion 1 and are each located 1.0 mile from the Project Site at 430 7th Street and 1335 Olive Street, as well as Fire Station 4 located 1.9 miles from the Project Site at 450 Temple Street. Existing fire stations that currently serve the Project Site are listed in Table IV.I.1-1 (Existing Fire Stations Serving the Project Site). The locations of these fire stations are shown in Figure IV.I.1-1 (Fire and Police Station Locations).

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\(^2\) Ibid.
### Table IV.I.1-1

Existing Fire Stations Serving the Project Site

<table>
<thead>
<tr>
<th>Station No.</th>
<th>Location</th>
<th>Equipment</th>
<th>Distance to Project Site (miles)</th>
<th>Response Time to Project Site (minutes) *</th>
</tr>
</thead>
</table>
| 3           | 108 Fremont Ave. | • 1 Task Force  
  o 1 Fire Truck  
  o 2 Fire Engine  
  • 1 Ambulance  
  • Staff of 12-14 at all times | 0.7                              | 3-5                                     |
| 9           | 430 7th St.     | • 1 Task Force  
  o 1 Fire Truck  
  o 2 Fire Engine  
  • 1 Ambulance  
  • Staff of 12-14 at all times | 1.0                              | 3-5                                     |
| 10          | 1335 Olive St.  | • 1 Task Force  
  o 1 Fire Truck  
  o 2 Fire Engine  
  • 1 Ambulance  
  • Staff of 12-14 at all times | 1.0                              | 3-5                                     |
| 4           | 450 Temple St.  | • 1 Task Force  
  o 1 Fire Truck  
  o 2 Fire Engine  
  • 1 Ambulance  
  • Staff of 12-14 at all times | 1.9                              | 3-5                                     |

* Due to traffic variations, exact response times are not available. Response times to the Project Site average between three and five minutes from the stations listed. Source: Phone interview, Captain Luke Milick, LAFD, January 13, 2010.

Source: Written correspondence with Inspector John Dallas, LAFD, Planning and Research Division, September 14, 2009. Appendix IV.I.1
Legend

Fire Stations

Fire Station #3
108 North Fremont Avenue

Fire Station #4
450 E Temple Street

Fire Station #9
430 East 7th Street

Fire Station #10
1335 East Olive Street

Police Station

Central Area Police Station
251 East 6th Street

i. Fire Station 3

Fire Station 3 is located at 108 Fremont Avenue, approximately 0.7 mile northeast of the Project Site and is the first-in response station to the Project Site. Fire Station 3 is staffed with 12 to 14 members at all times and is equipped, at a minimum, with 1 Task Force, composed of 1 fire truck and 2 fire engines, as well as 1 ambulance. The response times from Fire Station 3 to the Project Site average between three to five minutes.

ii. Fire Station 9

Fire Station 9 is located at 430 7th Street, approximately 1.0 mile east of the Project Site. Fire Station 9 is staffed with 12 to 14 members at all times and is equipped, at a minimum, with one Task Force, composed of one fire truck and two fire engines, as well as one ambulance. The response times from Fire Station 9 to the Project Site average between three to five minutes.

iii. Fire Station 10

Fire Station 10 is located at 1335 Olive Street, approximately 1.0 mile south of the Project Site. Fire Station 10 is staffed with 12 to 14 members at all times and is equipped, at a minimum, with one Task Force, composed of one fire truck and two fire engines, as well as one ambulance. The response times from Fire Station 10 to the Project Site average between three to five minutes.

iv. Fire Station 4

Fire Station 4 is located at 450 Temple Street, approximately 1.9 mile northeast of the Project Site. Fire Station 4 is staffed with 12 to 14 members at all times and is equipped, at a minimum, with one Task Force, composed of one fire truck and two fire engines, as well as one ambulance. The response times from Fire Station 4 to the Project Site average between three to five minutes.

v. Emergency Access

Emergency vehicle access to the Project Site is provided from local roadways adjacent to the Project Site. Major roadways near the Project include: Wilshire Boulevard, 7th Street, and Figueroa Street.

b. Regulatory Framework

i. Response Distance and Times

The Fire Code specifies maximum response distances allowed between specific locations and Engine/Truck companies, based on land use and fire flow requirements. The Fire Code states that the maximum response distance from an engine or truck company to a high density residential and commercial area should be 1.5 miles. When response distances exceed these requirements, all structures

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3 LAMC, Chapter 5, Public Safety and Protection, Division 9, Access, Hydrants, and Fire Flow, Section 57.09.07, Proposed Table 9C.
must be equipped with automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems, etc.). Fire Code Section 57.118.11 also requires the provision of automatic fire sprinkler systems in new high-rise developments.

Response time relates directly to the physical linear travel distance (i.e., the number of miles between a fire station and a specific location) and the LAFD’s ability to successfully navigate the given roadway network. Response times are measured from the time the dispatcher receives a call for service to the time the LAFD arrives at the site. Thus, roadway congestion, intersection level of service, weather conditions, and construction traffic along the response route can affect the response time. The LAFD’s response time goal for the Project Site is five minutes from all stations serving the Project Site.4

ii. Fire Flow

The City of Los Angeles Department of Water and Power (LADWP) currently provides water for fire flow to the Project Site. Fire flows are supplied by the same water mains as the domestic water systems including the lines located in the local streets and major roadways. In general, fire flow requirements are closely related to land use as the quantity of water necessary for fire protection varies with the type of development, life hazard, type and level of occupancy, and degree of fire hazard (based on such factors as building age or type of construction). City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In all cases, a minimum residual water pressure of 20 pounds per square inch (PSI) is to remain in the water system while the required gpm is flowing.5

Water for fire flows for the area surrounding the Project Site is also provided by the LADWP. All water mains and lines that are designed and sized according to LADWP standards take into account fire flow and pressure requirements. According to the LA FD, there are currently sufficient fire hydrants bordering the Project Site to provide adequate fire flow. Refer to Section IV.J.1 (Utilities – Water) for a discussion of water service infrastructure in the Project area.

2. ENVIRONMENTAL IMPACTS

a. Methodology

In accordance with standard LA FD methodology, adequate fire protection is determined based on the required fire flows for the land uses proposed, distance to the nearest fire station for the land uses proposed, and hydrant and access improvements. The LA FD does not determine the adequacy of fire protection based on response times or number of Emergency Medical Services (EMS) or fire-related

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5 LAMC, Chapter 5, Public Safety and Protection, Division 9, Access, Hydrants, and Fire Flow, Section 57.09.07, Proposed Table 9C.
incidents. The following discussion addresses the Project’s potential impacts on fire protection services based on fire flows, response distance, and LAFD review of hydrants and access.

b. Thresholds of Significance

The *L.A. CEQA Thresholds Guide* (2006, page K.2-3) states that a project would 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.

In addition, for purposes of this analysis, the Project would be considered to have a significant impact if:

- Proposed on-site development did not comply with all applicable LAFD code and ordinance requirements for construction, access, water mains, fire flow, and fire hydrants; or
- The Project inhibits emergency response by increasing roadway congestion within an area either during project construction or post-construction occupancy.

c. Project Design Features

The Project shall include a number of design features and procedures that would be implemented to minimize the potential damage due to a fire during the construction period:

- Maintenance of mechanical equipment in good operating condition with fully functional spark arresters shall be assured at all times.
- During construction, the careful storage of flammable materials in appropriate containers and the immediate and complete cleanup of spills of flammable materials when they occur shall be ensured.
- The Project shall provide adequate off-site public and on-site private fire hydrants and shall submit plot plans for LAFD approval of access and fire hydrants.

Additionally, Fire Code requirements that shall be implemented as part of the Project include compliance with all applicable state and local codes and ordinances, fire lane design (including width and clearances), fire hydrant locations, fire hydrant flow rates, access roads, turning areas, distances from street or fire lane to condominiums and hotels, requirements for accommodating LAFD equipment, and load bearing requirements for fire access areas to accommodate LAFD equipment.

d. Project Impacts

The Project would include the demolition of the existing structure, including existing subterranean parking, vacation of Francisco Street, and redevelopment of the 3.2-acre Project Site. The Project would develop a maximum of 560 hotel rooms and/or condo-hotel units, 100 residential dwelling units, 1,500,000 square feet of office uses, and 275,000 square feet of amenity areas including, but not limited to, Project-serving retail and restaurant uses, conference and meeting rooms, ballrooms, spa, fitness
center, and other ancillary hotel, residential, and office areas. The Project would be constructed over eight levels of subterranean parking containing approximately 1,900 parking spaces.

i. Construction Impacts

Construction on the Project Site would increase the potential for accidental on-site fires from such sources as the operation of mechanical equipment and use of flammable construction materials. In most cases, the implementation of “good housekeeping” procedures by the construction contractors and the work crews would minimize these hazards. Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. These impacts are considered to be less than significant for the following reasons:

- Construction impacts are temporary in nature and do not cause lasting effects to impact LAFD fire protection services;

- Partial lane closures, if determined to be necessary, would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until construction is complete; and

- As previously described, the Fire Code states that the maximum response distance from an engine or truck company to a high density residential and commercial area should be 1.5 miles. Response time relates directly to the physical linear travel distance (i.e., the number of miles between a fire station and a specific location) and the LAFD’s ability to successfully navigate the given roadway network. Therefore, as the Project Site is currently within the required 1.5-mile radius of LAFD Fire Station 3, 9, and 10 (see Table IV.I.1-1 [Existing Fire Stations Serving the Project Site]), response times would not be impacted, and fire protection services would not be impacted.

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

ii. Operational Impacts

The increase in employees, residents, and visitors to the Project Site generated by the Project would potentially increase demand for fire protection services. The subsequent discussion considers the major criteria for determining the Project’s potential impacts on fire protection services, including fire flows, response distance and time, and LAFD review of hydrants and access.
(1) **Fire Flows**

According to Fire Code Section 57.09.06, the overall fire flow requirement for the Project Site (a high density residential and commercial land use) is 4,000 gpm from four fire hydrants flowing simultaneously with a 20 PSI minimum residual pressure remaining in the system while the required gallons per minute are flowing.\(^6\) The Project would require a fire flow of 4,500 gpm from three fire hydrants flowing simultaneously.\(^7\) Water service is provided to the Project Site by 8- and 12-inch water lines beneath Wilshire Boulevard, a 10-inch water line beneath Figueroa Street, and 4- and 24-inch water lines beneath 7\(^{th}\) Street. The LADWP has indicated that the 12-inch water main beneath Wilshire Boulevard is capable of supplying 5,000 gpm and a system pressure of 39 PSI and the 10-inch water main beneath Figueroa Street is capable of supplying 5,000 gpm and a system pressure of 52 PSI.\(^8\) Additionally, the City requires implementation of Standard Mitigation Measures (refer to mitigation measure 2) to ensure the requisite fire flow for the Project Site. Further, the location and number of any new private hydrants would be determined as part of LAFD’s review of the Project plans (refer to mitigation measure 5). Therefore, through compliance with the City’s Standard Mitigation Measures, impacts on fire flow would be less than significant.

(2) **Response Distances and Times**

The LAFD has indicated that distance to the nearest fire station is the primary indicator of LAFD’s ability to provide adequate services. The current response time to the Project Site from Fire Station 3 averages between three and five minutes.\(^9\) According to the LAFD, a response time of less than five minutes is desirable.\(^10\) As discussed in Section IV.B (Transportation), after implementation of traffic mitigation measures 1 through 4, including the Transportation Demand Management (TDM) program, significant impacts would be reduced to two intersections and freeway on and off ramps in the morning peak hour and five intersections in the afternoon peak hour after full buildout in 2020. The following intersections would be significantly impacted with implementation of the Project: Figueroa Street & 5\(^{th}\) Street/Interstate 110 (the “Harbor Freeway”) on-ramps, Figueroa Street & 6\(^{th}\) Street/Harbor Freeway off-ramps, Figueroa Street & Wilshire Boulevard, Figueroa Street & 7\(^{th}\) Street, and Bixel Street/Harbor Freeway southbound on-ramp & 8\(^{th}\) Street. However, none of the intersections listed previously are en route from Fire Station 3 to the Project Site and as such, would not inhibit emergency response.

\(^6\) LAMC, Chapter 5, Public Safety and Protection, Division 9, Access, Hydrants, and Fire Flow, Section 57.09.07, Table 9-C.

\(^7\) Written correspondence from C.A Fry, Assistant Fire Marshal, Bureau of Fire Prevention and Public Safety, December 3, 2009.


\(^10\) Ibid.
For a high density residential and commercial neighborhood, a project must be within a response distance of 1.5 miles of an LAFD fire station in order for LA FD to provide adequate service. As shown in Table IV.I.1-1 (Existing Fire Stations Serving the Project Site), the Project Site is within a 1.5-mile radius of LAFD Fire Station 3, the first-in response station as well as Fire Stations 9, and 10. Furthermore, because the Project would be categorized as a high-rise, installation of an automatic sprinkler system is required under Fire Code Section 57.118.11 and is part of LAFD Standard No. 59 and would be implemented as a project design feature as noted previously. Conformance with applicable Fire Code and LAFD building requirements in conjunction with the proximity of the Project Site to area fire stations would provide adequate on-site fire protection and impacts would be less than significant.

(3) Emergency Access

Emergency vehicle access to the Project Site would continue to be provided from the local roadway Francisco Street and major roadways adjacent to the Project Site including Wilshire Boulevard, 7th Street, and Figueroa Street. All circulation improvements, described in Section IV.B (Transportation), that are proposed for the Project Site would be in compliance with the Fire Code, including any additional access requirements of the LAFD. Additionally, emergency access to the Project Site would be maintained at all times. Therefore, impacts related to emergency access would be less than significant.

e. Land Use Equivalency Program

The Project includes a Land Use Equivalency Program to maintain flexibility of Project uses and floor areas so that the Project could respond to the changing needs of the Southern California economy. The Land Use Equivalency Program defines a framework within which the proposed mix of land uses could be modified within the development envelope defined by the approved entitlements without resulting in any new significant impacts or a substantial increase in the severity of previously identified significant impacts as analyzed in this EIR.

Table IV.I.1-2 (Project Comparison with Highest On-Site Population Scenarios) shows the total employee and resident population generations that could be possible under the most impactful scenarios to public services.

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Land Use Equivalency Program</th>
<th>Employee Generation Rate (employees / ksf)</th>
<th>Employee Generation Subtotal</th>
<th>Resident Generation Rate (persons per household)</th>
<th>Total on-site employee population</th>
<th>Total on-site resident population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project</td>
<td>1,500,000 sf of office</td>
<td>3.4965</td>
<td>5,245</td>
<td>n/a</td>
<td>6,022</td>
<td>189</td>
</tr>
<tr>
<td></td>
<td>560 rms (563,400 sf)</td>
<td>1.1325</td>
<td>638</td>
<td>n/a</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>100 du</td>
<td>n/a</td>
<td>&lt;5b</td>
<td>1.89</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>20,000 sf of fitness center</td>
<td>1.1325</td>
<td>22</td>
<td>n/a</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>10,000 sf of retail</td>
<td>2.2371</td>
<td>22</td>
<td>n/a</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Table IV.I.1-2

**Project Comparison with Highest On-Site Population Scenarios**

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Land Use Equivalency Program</th>
<th>Employee Generation Rate (employees / ksf)</th>
<th>Employee Generation Subtotal</th>
<th>Resident Generation Rate (persons per household)</th>
<th>Total on-site employee population</th>
<th>Total on-site resident population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Office traded for maximum residential and hotel uses</td>
<td>40,000 sf of restaurant</td>
<td>2.2371</td>
<td>90 n/a</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>899,000 sf of office</td>
<td>3.4965</td>
<td>3,143 n/a</td>
<td></td>
<td>4,608</td>
<td>2,079</td>
</tr>
<tr>
<td></td>
<td>1,120 rms (1,166,800 sf)^a</td>
<td>1.1325</td>
<td>1,321 n/a</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>1,100 du</td>
<td>n/a</td>
<td>&lt;10^b</td>
<td>1.89</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>20,000 sf of fitness center</td>
<td>1.1325</td>
<td>22 n/a</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>10,000 sf of retail</td>
<td>2.2371</td>
<td>22 n/a</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>40,000 sf of restaurant</td>
<td>2.2371</td>
<td>90 n/a</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Office traded for maximum amounts of the other uses</td>
<td>362,000 sf of office</td>
<td>3.4965</td>
<td>1,266 n/a</td>
<td></td>
<td>3,213</td>
<td>2,079</td>
</tr>
<tr>
<td></td>
<td>1,120 rms (1,166,800 sf)^a</td>
<td>1.1325</td>
<td>1,321 n/a</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>1,100 du</td>
<td>n/a</td>
<td>&lt;10^b</td>
<td>1.89</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>50,000 sf of fitness center</td>
<td>1.1325</td>
<td>57 n/a</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>200,000 sf of retail</td>
<td>2.2371</td>
<td>447 n/a</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>50,000 sf of restaurant</td>
<td>2.2371</td>
<td>112 n/a</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hotel traded for the maximum amount of residential use</td>
<td>1,500,000 sf of office</td>
<td>3.4965</td>
<td>5,245 n/a</td>
<td></td>
<td>5,389</td>
<td>1,839</td>
</tr>
<tr>
<td></td>
<td>0 rms</td>
<td>1.1325</td>
<td>0 n/a</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>973 du</td>
<td>n/a</td>
<td>&lt;10^b</td>
<td>1.89</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>20,000 sf of fitness center</td>
<td>1.1325</td>
<td>22 n/a</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>10,000 sf of retail</td>
<td>2.2371</td>
<td>22 n/a</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>40,000 sf of restaurant</td>
<td>2.2371</td>
<td>90 n/a</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hotel and Office traded for maximum amount of residential use</td>
<td>1,459,164 sf of office</td>
<td>3.4965</td>
<td>5,102 n/a</td>
<td></td>
<td>5,236</td>
<td>2,079</td>
</tr>
<tr>
<td></td>
<td>0 rms</td>
<td>1.1325</td>
<td>0 n/a</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>1,100 du</td>
<td>n/a</td>
<td>1.89</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>20,000 sf of fitness center</td>
<td>1.1325</td>
<td>22 n/a</td>
<td></td>
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<td></td>
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<td>22 n/a</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>40,000 sf of restaurant</td>
<td>2.2371</td>
<td>90 n/a</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

^Note: sf = square feet; ksf = 1,000 square feet; rms = rooms; du = residential dwelling units

^a Hotel square footage assumes 640 sf per hotel room, and also includes the ancillary hotel areas.

^b The School Fee Justification Studies for Los Angeles Unified School District do not include employee generation factors for multi-family residential uses. The small number of employees (estimated at 5 employees in the Project scenario and 10 employees in the maximum residential use scenario), in addition to the projected hotel employees, is assumed to be required to provide management and maintenance for the multi-family residential uses and is accounted for in the hotel employee generation factor.

*Source: Christopher A. Joseph & Associates, 2010.*

As shown on Table IV.I.1-2, under the Land Use Equivalency Program, the development scenario with the highest on-site population would be realized if the hotel and office uses were exchanged to achieve the maximum amount of residential use of 1,100 residential dwelling units, as it would generate the greatest amount of population on-site for both employee and resident populations, 5,236 employees and 2,079 residents, respectively. However, this increase in both employee and resident populations would not interfere with or change LAFD’s current response distance or time, or emergency access to the site.
Additionally, development under the Land Use Equivalency Program would be required to implement the same project design features and mitigation measures as identified in this EIR to ensure adequate fire flow. Therefore, impacts on fire protection services associated with the Land Use Equivalency Program would be less than significant.

**f. Design Flexibility Program**

The design of the Project as a conceptual plan allows for flexibility in the finalized building design within a determined set of parameters. Access points and site circulation shall be maintained in general conformance with the conceptual plan for the Project and all project design features shall be implemented as described previously. Additionally, emergency access to the Project Site would be maintained at all times and the Applicant would submit plot plans for LAFD approval as to emergency access. Therefore, impacts related to fire protection services associated with the Design Flexibility Program would be less than significant.

### 3. CUMULATIVE IMPACTS

Implementation of the Project in combination with the related projects identified in Section III (Environmental Setting), would further 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 Applicant of the Project and the applicants of the related projects would be required to contribute.

As discussed previously, the Project Site is currently served by Fire Station No. 3, with supplemental fire services provided by Fire Station No. 9, Fire Station No. 10, and Fire Station No. 4. Of the 92 related projects, 18 related projects (Nos. 7, 8, 12, 16, 20, 31, 38, 39, 41, 46, 47, 59, 68, 70, 73, 89, 90, and 92) would also be primarily served by Fire Station No. 3. Eleven related projects (Nos. 5, 29, 30, 32, 43, 51, 53, 67, 76, 81, and 82) would be primarily served by Fire Station No. 9, 24 related projects (Nos. 1, 2, 14, 15, 18, 22, 28, 35, 40, 45, 48, 49, 52, 55, 56, 61, 62, 69, 74, 78, 83, 84, 87, and 88) would be primarily served by Fire Station No. 10, and 12 related projects (Nos. 4, 6, 11, 17, 21, 25, 26, 34, 42, 54, 58, and 86) would be served by Fire Station No. 4.

Four related projects (Nos. 3, 23, 57, and 66) would be served by Fire Station No. 14, 16 related projects (Nos. 9, 10, 13, 19, 24, 33, 36, 37, 44, 50, 60, 71, 72, 77, 80, and 85) would be served by Fire Station No. 11, four related projects (Nos. 27, 64, 65, and 91) are served by Fire Station No. 17, one related project (No. 63) is served by Fire Station No. 6, one related project (No. 79) is served by Fire Station No. 20, and one related project (No. 75) is served by Fire Station No. 15 which do not serve the Project Site. Therefore, the Project would combine with 18 of the related projects identified to create a cumulative demand for fire protection services from Fire Station No. 3. The Project would also combine with 11 of the related projects identified to create a cumulative demand for fire protection services from Fire Station No. 9, with 24 of the related projects identified to create a cumulative demand for fire protection services from Fire Station No. 10, and would combine with 12 of the related projects identified to create a cumulative demand for fire protection services from Fire Station No. 4.
The LAFD determines adequate fire protection based on fire flows, response distance, and LAFD review of hydrants and access. LAFD does not determine the adequacy of fire protection based on response times or number of EMS or fire-related incidents. As discussed previously, for any project with a residential component that is located more than 1.5 miles from the nearest LAFD engine or truck company, LAMC Section 57.09.06 would require the installation of automatic fire sprinkler systems in order to compensate for the additional response distance. Therefore, each of the related projects would be required to install automatic fire sprinkler systems if located at a distance to the nearest fire station that exceeded the LAFD required response distance. Overall, as the Project would have a less than significant impact with implementation of the required mitigation measures, the Project would not combine with related projects to create a cumulative impact to fire protection services. With both the Project and related projects’ adherence to all applicable local and state fire regulations, cumulative impacts would be less than significant.

4. PROJECT DESIGN FEATURES AND MITIGATION MEASURES

The Project would include the following project design features:

**PDF-1:** Maintenance of mechanical equipment in good operating condition with fully functional spark arresters shall be assured at all times.

**PDF-2:** During construction, the careful storage of flammable materials in appropriate containers and the immediate and complete cleanup of spills of flammable materials when they occur shall be ensured.

**PDF-3:** The Project shall provide adequate off-site public and on-site private fire hydrants and shall submit plot plans for LAFD approval of access and fire hydrants.

No significant impacts related to fire protection services have been identified; however, the City requires implementation of the following Standard Mitigation Measures:

**MM-1:** During demolition and construction, LAFD access from major roadways and internal roadways shall remain clear and unobstructed.

**MM-2:** The Applicant or its successor shall submit a plot plan to the LAFD prior to occupancy of the Project for review and approval that shall provide the capacity of the fire mains serving the Project Site and projected demands. Any required upgrades shall be identified and implemented prior to occupancy of the Project.

**MM-3:** The design of the Project Site shall provide adequate access for LAFD equipment and personnel to the structure.

**MM-4:** 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 travel distances shall be computed to the front door of the unit.
MM-5: The Applicant or its successor shall submit plot plans for LAFD approval of access and fire hydrants.

MM-6: The Project shall provide adequate off-site public and on-site private fire hydrants.

MM-7: The Applicant or its successor shall install an automatic sprinkler system in accordance with Fire Code Section 57.118.11 and in conformance with LAFD Standard No. 59.

The following mitigation measure shall be implemented, as required by existing regulations:

MM-8: Fire Code requirements that shall be implemented as part of the Project include compliance with all applicable state and local codes and ordinances, fire lane design (including width and clearances), fire hydrant locations, fire hydrant flow rates, access roads, turning areas, distances from street or fire lane to condominiums and hotels, requirements for accommodating LAFD equipment, and load bearing requirements for fire access areas to accommodate LAFD equipment.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts on fire protection services would be less than significant.
IV. ENVIRONMENTAL IMPACT ANALYSIS

1. PUBLIC SERVICES

2. POLICE PROTECTION

This Subsection describes the potential impacts of the Project on public police protection services in the Project area. This Subsection’s analysis is based on information provided by the City of Los Angeles Police Department.

1. ENVIRONMENTAL SETTING

   a. Existing Police Service
      i. Existing Police Stations
   b. Regulatory Framework
      i. Response Times
      ii. LAPD Review

2. ENVIRONMENTAL IMPACTS

   a. Methodology
   b. Thresholds of Significance
   c. Project Design Features
   d. Project Impacts
      i. Construction Impacts
      ii. Operational Impacts
      iii. Officer-to-Population Ratio
      iv. Response Times
      v. Emergency Access
   e. Land Use Equivalency Program
   f. Design Flexibility Program

3. CUMULATIVE IMPACTS

4. PROJECT DESIGN FEATURES AND MITIGATION MEASURES
5. LEVEL OF SIGNIFICANCE AFTER MITIGATION
1. ENVIRONMENTAL SETTING

a. Existing Police Service

Police protection services in the City are provided by the City of Los Angeles Police Department (LAPD). The LAPD is divided into four Police Station Bureaus: Central Bureau, South Bureau, Valley Bureau, and West Bureau. Each of the bureaus encompasses several community stations.

i. Existing Police Stations

The Project Site is located within the LAPD’s Central Bureau and is served by the Central Community Police Station, located at 251 6th Street (see Figure IV.I.1-1 [Fire and Police Station Locations]). The Central Community Police Station serves an approximately 4.5 square-mile area and a population of approximately 31,849 residents.11 With 300 sworn officers, the Central Community Police Station currently provides an officer-to-population ratio of approximately 9.4 officers per 1,000 residents.12 The Central Community Police Station is also staffed with 100 civilian support staff. Though there is no official standard, the LAPD prefers to maintain a ratio of one officer per 1,000 residents.13

b. Regulatory Framework

Under the City Charter, the Board of Police Commissioners is the head of the LAPD. The Board of Police Commissioners sets overall policy while the Chief of Police manages the daily operations of the LAPD and implements the Board of Police Commissioners’ policies.

i. Response Times

Response time represents the period of time elapsed from the initiation of an assistance call to the appearance of a police unit at the scene. Calls for police assistance are prioritized based on the nature of the call. Unlike fire protection services (as discussed in Section IV.I.1 [Public Services – Fire Protection]), police units are most often in a mobile state; hence, actual distance between a headquarters facility and a given Project Site is of little relevance. Instead, the number of police officers out on the street is more directly related to the realized response time. The LAPD has a preferred response time of seven minutes to emergency calls.14

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12 \([300 \text{ officers} \times 1,000 \text{ residents}] \div 31,849 \text{ Central Community residents} = 9.4 \text{ officers per 1,000 residents}\).

13 Phone interview with Sergeant Morales, LAPD, Community Crime Liaison Unit, January 11, 2010.

14 Ibid.
ii. LAPD Review

The LAPD has strongly recommended that developers of large-scale projects contact the LAPD for advice with regard to crime prevention features that may be incorporated into the site design. As a project design feature, the Project shall comply with the standards of the LAPD’s “Design Out Crime” program.

2. ENVIRONMENTAL IMPACTS

a. Methodology

The environmental impacts of a project with respect to police protection are determined based on a project’s need for a new or physically altered police station. The adequacy of police protection is evaluated using the existing number of police officers in a project’s police service area, the number of persons currently served in the area, the adequacy of the existing officer-to-population ratio in the area, and the number of persons that a project would introduce to the area. Using these statistics, it is possible to estimate the future officer-to-population ratio in the area that would occur and the number of officers that would be necessary to maintain the existing level of police protection (or, if the existing level is not considered adequate, the number required to obtain an adequate level of police protection). This need can be reduced through on-site security improvements. This increase in officers is then determined to be either accommodated within the existing police station(s) in the area, or may require the construction of a new or expansion of an existing police station.

b. Thresholds of Significance

The L.A. CEQA Thresholds Guide (page K.1-2) states that a determination of significance relative to police protection shall be made on a case-by-case basis, considering the following factors:

- The population increase resulting from the Project, based on the net increase of residential dwelling units or square footage of non-residential floor area;
- 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 (facilities, equipment, and officers) and the Project’s proportional contribution to the demand; and
- Whether the Project includes security and/or design features that would reduce the demand for police services.

Based on all of these factors, the Project would have a significant impact if:

- It would generate demand for additional police protection services that substantially exceed the capability of the LAPD to serve the Project Site; or
- It would cause a substantial increase in emergency response times as a result of increased traffic congestion attributable to the Project.
c. **Project Design Features**

- The Applicant or its successor shall take precautions to prevent trespassing through construction sites.
- Temporary fencing shall be installed around the construction site.
- The Applicant or its successor shall deploy roving security guards on-site as another effective strategy in preventing problems from occurring.
- The Applicant or its successor shall employ construction security features, such as fencing, that would serve to minimize the need for LAPD services.
- The Project design shall address access control to proposed structures including parking areas, proposed security lighting, landscaping planning, and minimization of dead space to eliminate areas of concealment, and provision of security patrol throughout the Project Site, if needed.
- The Project shall include closed circuit TV monitoring in all buildings, key card security systems, alarms, and design of building entrances and open spaces to be open and in view of surrounding areas.


d. **Project Impacts**

The Project would include the demolition of the existing structure, including existing subterranean parking, vacation of Francisco Street, and redevelopment of the 3.2-acre Project Site. The Project would develop a maximum of 560 hotel rooms and/or condo-hotel units, 100 residential dwelling units, 1,500,000 square feet of office uses, and 275,000 square feet of amenity areas including, but not limited to, Project-serving retail and restaurant uses, conference and meeting rooms, ballrooms, spa, fitness center, and other ancillary hotel, residential, and office areas. The Project would be constructed over eight levels of subterranean parking containing approximately 1,900 parking spaces.

  
i. **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.

Traffic generated by construction workers and trucks would occur primarily during off-peak hours. Although minor traffic delays could result from construction activities at times, these impacts would be temporary in nature and would be coordinated ahead of time with local police and emergency officials. Therefore, traffic construction impacts to police services would be less than significant.
**ii. Operational Impacts**

Although there is not a direct proportional relationship between increases in land use activity and increases in demand for police protection services, the number of calls for police response to home burglaries, vehicle burglaries, damage to vehicles, traffic-related incidents, and crimes against persons would be anticipated to increase with the increase in on-site activity and increased traffic on adjacent streets and arterials. Such calls are typical of problems experienced in existing neighborhoods in the Project area and do not represent unique law enforcement issues specific to the Project. The discussion later in this Subsection considers some of the criteria that may be used to determine the Project’s impact on police protection services, including LAPD response time and staffing levels in the Project area.

The Project would include adequate and strategically positioned functional 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 structures would also include crime prevention features, such as nighttime security lighting, secure parking facilities, and provision of security patrol if necessary. Development of the Project would result in a less than significant operational impact on police protection services. However, with the implementation of mitigation measures 8 and 9, operational impacts would be further reduced and are therefore recommended.

**iii. Officer-to-Population Ratio**

The Project would generate approximately 189 permanent residents. The addition of these new residents at the Project Site would not require any additional officers in order to maintain the current officer-to-population ratio in the greater Central Area, as 189 additional residents to the Central Area would only result in a minimal change of the current ratio of 9.4 officers per 1,000 residents.\(^\text{15}\) Therefore, impacts associated with the officer-to-population ratio would be less than significant.

**iv. Response Times**

As discussed in Section IV.B (Transportation), after implementation of traffic mitigation measures 1 through 4, including the TDM program, significant impacts would be reduced to two intersections in the morning peak hour and five intersections in the afternoon peak hour after full buildout in 2020. The following intersections and freeway on and off ramps would be significantly impacted with implementation of the Project: Figueroa Street & 5th Street/Harbor Freeway on-ramps, Figueroa Street & 6th Street/Harbor Freeway off-ramps, Figueroa Street & Wilshire Boulevard, Figueroa Street & 7th Street, and Bixel Street/Harbor Freeway southbound on-ramp & 8th Street.

However, as previously discussed, police units are most often in a mobile state; therefore, it is unknown precisely which route the LAPD would use to access the Project Site when responding to an emergency call. Thus, a police unit accessing the Project Site from the surrounding area may or may not pass

\(^{15}\) \(\text{(one officer} \times 189 \text{new residents)} \div 1,000 \text{residents} = 0.189 \approx 0 \text{required officers.}\)
through at least one of the impacted study intersections. As such, response times would not be greatly affected, as emergency vehicles normally have a variety of options for avoiding traffic such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, Project impacts related to response times would be less than significant.

v. Emergency Access

Emergency access to the Project Site would be provided by the existing and proposed street system. The Project would be designed and constructed in accordance with LAMC requirements to ensure proper emergency access. Therefore, impacts on emergency access would be less than significant.

e. Land Use Equivalency Program

The Project includes a Land Use Equivalency Program to maintain flexibility of Project uses and floor areas so that the Project could respond to the changing needs of the Southern California economy. The Land Use Equivalency Program defines a framework within which the proposed mix of land uses could be modified within the development envelope defined by the approved entitlements without resulting in any new significant impacts or a substantial increase in the severity of previously identified significant impacts as analyzed in this EIR.

Table IV.I.1-2 (Project Comparison with Highest On-Site Population Scenarios), shown previously, shows the potential impact on public services when the total employee and resident population generations are the highest possible under the Land Use Equivalency Program. Under the Land Use Equivalency Program, the development scenario with the highest on-site population would be realized if the hotel and office uses were exchanged to achieve the maximum amount of residential use of 1,100 residential dwelling units, as it would generate the greatest amount of population on-site for both employee and resident populations, 5,236 employees and 2,079 residents, respectively.

This population would change the existing officer-to-resident population ratio in the Central Area to 7.4 officers per 1,000 residents. The resulting officer-to-resident population ratio in the Central Area under this scenario would still surpass the preferred ratio standard of one officer to 1,000 population, i.e., the Central Community Police Station currently employs a more-than-adequate level of police officers that could provide police protection services for the Project in the maximum on-site population scenario. While the maximum increase in on-site population scenario could increase the number of emergency calls received by LAPD, impacts to response times would remain less than significant, given the nature of mobile police units and their authority to perform traffic-avoiding maneuvers, as discussed previously. Further, the high-density design of the Project would allow the existing Central Area police force to serve a greater number of citizens in a concentrated amount of space, which would also reduce any Project-generated need for additional police officers. Therefore, impacts of the Land Use Equivalency Program on police services would be less than significant.

16 Phone interview with Sergeant Morales, LAPD, Community Crime Liaison Unit, January 11, 2010.
f. Design Flexibility Program

The Design Flexibility Program would allow for flexibility in the finalized building design within a determined set of parameters. Access points and site circulation shall be maintained in general conformance with the conceptual plan for the Project and all project design features related to security shall be implemented as described previously. Additionally, emergency access to the Project Site would be maintained at all times. Therefore, impacts related to police services associated with the Design Flexibility Program would be less than significant.

3. CUMULATIVE IMPACTS

Implementation of the Project in combination with ambient growth and the related projects identified in Section III (Environmental Setting), would further increase the demand for police protection services in the Project area. As discussed previously, the Project is located within the Central Area, which has an existing police service population of approximately 31,849 persons. In addition, of the 92 related projects identified, 49 related projects (Nos. 1, 5, 6, 11, 15, 17, 18, 20, 21, 22, 24, 25-30, 32, 34, 39, 40, 41, 42, 45, 47, 48, 51-56, 58, 59, 67, 69, 70, 74, 76, 78, 82, 83, 84, 86-89, and 92) would also be served by the Central Community Police Station. Eleven related projects would be served by the Newton Community Police Station (Nos. 2, 3, 14, 23, 43, 49, 57, 62, 64, 66, and 81). Three related projects would be served by the Hollenbeck Community Police Station (Nos. 4, 65, and 91). Twenty-seven related projects would be served by the Rampart Community Police Station (Nos. 7-10, 12, 16, 19, 31, 33, 36, 37, 38, 44, 46, 50, 60, 63, 68, 71, 72, 73, 77, 79, 80, 85, and 90). Two related projects would be served by the Southwest Community Police Station (Nos. 35 and 75). Estimated Cumulative Police Service Population, the residential population associated with the Project, ambient growth, and the 49 related projects in the Central Community Police Service Area would result in a 45,236-person cumulative increase in the police service population for the Central Community Police Station. Based on this additional population and the preferred ratio of one officer per 1,000 residents, the additional population resulting from buildout of the Project and the related projects would require 45 additional officers.

As the related projects are developed it may be necessary to provide a new, expanded, consolidated, or relocated police facility. Similar to the 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 in order to adequately address police protection service demands. Furthermore, each related project would also contribute additional tax revenue or fees that could be used for commensurate expansion of police services and the hiring of additional police officers as needed by the LAPD. Therefore, cumulative impacts with respect to police protection services would be less than significant.

17 Ibid.
18 \[
\frac{(\text{one officer} \times 45,236 \text{ Cumulative residents})}{1,000 \text{ residents}} \approx 45 \text{ officers.}
\]
4. PROJECT DESIGN FEATURES AND MITIGATION MEASURES

The Project would include the following project design features:

**PDF-4:** The Applicant or its successor shall take precautions to prevent trespassing through construction sites.

**PDF-5:** Temporary fencing shall be installed around the construction site.

**PDF-6:** The Applicant or its successor shall deploy roving security guards on-site as another effective strategy in preventing problems from occurring.

**PDF-7:** The Applicant or its successor shall employ construction security features, such as fencing, that would serve to minimize the need for LAPD services.

**PDF-8:** The Project design shall address access control to proposed structures including parking areas, proposed security lighting, landscaping planning, and minimization of dead space to eliminate areas of concealment, and provision of security patrol throughout the Project Site, if needed.

**PDF-9:** The Project shall include closed circuit TV monitoring in all buildings, key card security systems, alarms, and design of building entrances and open spaces to be open and in view of surrounding areas.

No significant impacts related to police services have been identified; however, the City requires implementation of the following Standard Mitigation Measures:

**MM-9:** The Project design shall address access control to proposed structures including parking areas, security lighting, landscaping planning and minimization of dead space to eliminate areas of concealment, and provision of security patrol throughout the Project Site if needed. The *Design Out Crime Guidelines: Crime Prevention Through Environmental Design*, published by LAPD, shall be used for reference. All crime prevention features shall be reviewed and approved by LAPD prior to the issuance of a building permit.

**MM-10:** Upon completion of the Project, the Applicant or its successor shall provide the LAPD’s Central Area Commanding Officer with a diagram of all portions of the Project Site that includes access routes and any other applicable information that could facilitate police response.

**MM-11:** Prior to the issuance of a certificate of occupancy for each construction phase and ongoing during operations, the Applicant or its successor shall develop an Emergency Procedures Plan to address emergency concerns and practices. The plan shall be subject to review by LAPD.
5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts on police protection services would be less than significant.
IV. ENVIRONMENTAL IMPACT ANALYSIS
I. PUBLIC SERVICES
3. SCHOOLS

This Subsection describes the potential impacts of the Project on public school services in the Project area. This Subsection’s analysis is based on the following correspondence with the City of Los Angeles Unified School District, which can be found in Appendix IV.I.3:

- City of Los Angeles Unified School District Response Letter, Rena Perez, Director, Master Planning & Demographics, October 8, 2009.

1. ENVIRONMENTAL SETTING
   a. Existing Schools
   b. Regulatory Framework
      i. Open Enrollment Policy
      ii. School Facilities Fees

2. ENVIRONMENTAL IMPACTS
   a. Methodology
   b. Thresholds of Significance
   c. Project Impacts
   d. Land Use Equivalency Program
   e. Design Flexibility Program

3. CUMULATIVE IMPACTS

4. PROJECT DESIGN FEATURES AND MITIGATION MEASURES

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION
1. ENVIRONMENTAL SETTING

a. Existing Schools

Public schools in the City are under the jurisdiction of the LAUSD. The LAUSD is divided into eight local districts. The Project is located within Local District 4. The LAUSD schools that currently serve the Project Site are listed in Table IV.I.3-1 (LAUSD School Capacity and Enrollment), along with the location, enrollment capacities, 2008 to 2009 enrollments, and number of students above or below capacity for each of the schools listed.

Schools located in the Central City area that would serve the Project Site are as follows: Castelar Elementary School, Gratts Elementary School, Liechty Middle School, and Belmont Senior High School Option Area. The locations of these schools are shown in Figure IV.I.3-1 (Schools and Library Serving the Project Site). As shown in Table IV.I.3-1 (LAUSD School Capacity and Enrollment), Castelar Elementary and Gratts Elementary are operating under capacity. Liechty Middle School and Belmont Senior High School, including option schools, are currently operating above capacity.

<table>
<thead>
<tr>
<th>School Type (Grade)</th>
<th>School Name</th>
<th>Location</th>
<th>No. of Tracks</th>
<th>Capacity</th>
<th>2008-2009 Resident Enrollment</th>
<th>(-)/Under / (+)Over Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Elementary School (Grades K-6)</td>
<td>Castelar</td>
<td>840 Yale St.</td>
<td>1</td>
<td>800</td>
<td>755</td>
<td>-45</td>
</tr>
<tr>
<td>Elementary School (Grades K-6)</td>
<td>Gratts</td>
<td>309 Lucas Ave.</td>
<td>3</td>
<td>918</td>
<td>900</td>
<td>-18</td>
</tr>
<tr>
<td>Middle School (Grades 7-8)</td>
<td>Liechty</td>
<td>650 S. Union Ave.</td>
<td>1</td>
<td>1908</td>
<td>2,101</td>
<td>+193</td>
</tr>
<tr>
<td>Senior High School Option Area (Grades 9-12)</td>
<td>Belmont and Option Area</td>
<td>1575 West 2nd St.</td>
<td>1</td>
<td>6,790</td>
<td>7,591</td>
<td>+801</td>
</tr>
</tbody>
</table>

Source: Letter Correspondence with Rena Perez, Director, Master Planning and Demographics, Los Angeles Unified School District, October 8, 2009. Appendix IV.I.3.


19 Schools and programs that are part of a “school option area” pull enrollments from the school(s) that have resident areas, as defined by attendance boundaries. Letter Correspondence with Rena Perez, Director, Master Planning and Demographics, LAUSD, October 8, 2009.
Figure IV.I.3-1
Schools and Library Serving the Project Site

Legend

School Locations
Belmont Senior High School
1575 West 2nd Street

Gratts Elementary
309 Lucas Avenue

Liechty Middle School
650 South Union Avenue

Belmont Senior High School
1575 West 2nd Street

Library Location
Central Library
630 West 5th Street

b. Regulatory Framework

i. Open Enrollment Policy

Pursuant to Assembly Bill (AB) 149 and AB 2071, the State of California mandates an open enrollment policy that enables students anywhere in the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated “open enrollment” seats. The number of open enrollment seats is determined annually. Each individual school is assessed based on the principal’s knowledge of new housing and other demographic trends in the attendance area. Open enrollment seats are granted through an application process that is completed before the school year begins. Students living in a particular school’s attendance area are not displaced by a student requesting an open enrollment transfer to that school.20

ii. School Facilities Fees

California Education Code Section 17620 subdivision (a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan supports the school district’s levy of the fees authorized by California Education Code Section 17620.21

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 California Government Code Section 65995.5-7, the LAUSD has imposed Level 2 residential developer fees at a rate of $3.87 per square-foot of new residential construction, $0.47 per square foot of commercial/industrial space, and $0.09 per square-foot of parking structure construction within the boundaries of the LAUSD.22


21 LAUSD, School Facilities Fee Plan, March 2, 2002.

22 Developer fees obtained from LAUSD, October 2009. These rates are subject to change.
2. ENVIRONMENTAL IMPACTS

a. Methodology

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

b. Thresholds of Significance

The L.A. CEQA Thresholds Guide (page K.3-2) states that a determination of significance relative to schools shall be made on a case-by-case basis, considering the following factors:

- The population increase resulting from the Project, based on the increase in residential dwelling units or square footage of non-residential floor area;
- The demand for school services anticipated at the time of Project buildout compared to the expected level of service available. Consider as applicable, scheduled improvements to LAUSD services (facilities, equipment and personnel) and the Project’s proportional contribution to the demand;
- 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 that would create a temporary or permanent impact on the school(s); and
- Whether the Project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

Based on all of these factors, the Project would have a significant impact if the number of LAUSD students generated by the Project would exceed the capacity of the LAUSD schools that serve the Project Site, thereby requiring the construction of new facilities, and/or modifications to the existing operational characteristics of the school (e.g., a major reorganization of students or classrooms, major revisions to the school calendar, or other actions that would create a temporary or permanent impact on the school[s]). School capacity is defined as the number of students that can be accommodated at a school based on existing facilities.

c. Project Impacts

As shown in Table IV.I.3-2 (Project Estimated Student Generation), the Project would generate a total net increase of approximately 122 students, including 77 elementary students, 41 middle school students, and 41 high school students.
## Table IV.I.3-2
Project Estimated Student Generation

<table>
<thead>
<tr>
<th>Use Type</th>
<th>Amount of Development</th>
<th>School Type</th>
<th>Student Generation Factor</th>
<th>Total Students Generated&lt;sup&gt;a&lt;/sup&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Existing Uses</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hotel</td>
<td>693,240 sf&lt;sup&gt;b,c&lt;/sup&gt;</td>
<td>Elementary School (K-6)</td>
<td>0.000012</td>
<td>8</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Middle School (7-8)</td>
<td>0.0000063</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td></td>
<td>High School (9-12)</td>
<td>0.0000062</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Elementary School (K-6)</td>
<td>0.0000373</td>
<td>8</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Middle School (7-8)</td>
<td>0.000194</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td></td>
<td>High School (9-12)</td>
<td>0.000192</td>
<td>4</td>
</tr>
<tr>
<td>Office</td>
<td>215,000 sf</td>
<td>Elementary School (K-6)</td>
<td>0.000238</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Middle School (7-8)</td>
<td>0.000123</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>High School (9-12)</td>
<td>0.000123</td>
<td>1</td>
</tr>
<tr>
<td>Retail/Restaurant</td>
<td>86,800 sf</td>
<td>Elementary School (K-6)</td>
<td>0.000373</td>
<td>8</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Middle School (7-8)</td>
<td>0.000194</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td></td>
<td>High School (9-12)</td>
<td>0.000192</td>
<td>4</td>
</tr>
<tr>
<td><strong>Total Existing Students</strong></td>
<td></td>
<td></td>
<td></td>
<td>35</td>
</tr>
<tr>
<td><strong>Proposed Uses</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Multi-Family Residential</td>
<td>100 du</td>
<td>Elementary School (K-6)</td>
<td>0.1266</td>
<td>13</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Middle School (7-8)</td>
<td>0.0692</td>
<td>7</td>
</tr>
<tr>
<td></td>
<td></td>
<td>High School (9-12)</td>
<td>0.0659</td>
<td>7</td>
</tr>
<tr>
<td>Office</td>
<td>1,500,000 sf</td>
<td>Elementary School (K-6)</td>
<td>0.0000373</td>
<td>56</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Middle School (7-8)</td>
<td>0.000194</td>
<td>29</td>
</tr>
<tr>
<td></td>
<td></td>
<td>High School (9-12)</td>
<td>0.000192</td>
<td>29</td>
</tr>
<tr>
<td>Hotel</td>
<td>583,400 sf&lt;sup&gt;c&lt;/sup&gt;</td>
<td>Elementary School (K-6)</td>
<td>0.00012</td>
<td>7</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Middle School (7-8)</td>
<td>0.000063</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td></td>
<td>High School (9-12)</td>
<td>0.000062</td>
<td>4</td>
</tr>
<tr>
<td>Retail/Restaurant</td>
<td>50,000 sf</td>
<td>Elementary School (K-6)</td>
<td>0.000238</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Middle School (7-8)</td>
<td>0.000123</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>High School (9-12)</td>
<td>0.000123</td>
<td>1</td>
</tr>
<tr>
<td><strong>Total Elementary School</strong></td>
<td></td>
<td></td>
<td></td>
<td>77</td>
</tr>
<tr>
<td><strong>Total Middle School</strong></td>
<td></td>
<td></td>
<td></td>
<td>41</td>
</tr>
<tr>
<td><strong>Total High School</strong></td>
<td></td>
<td></td>
<td></td>
<td>41</td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td></td>
<td></td>
<td></td>
<td>157</td>
</tr>
<tr>
<td>Less Existing</td>
<td>(35)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total Net New Students Generated</strong></td>
<td></td>
<td></td>
<td></td>
<td>122</td>
</tr>
</tbody>
</table>

<sup>a</sup> The number of students has been rounded to the nearest whole number.
<sup>b</sup> Hotel uses include both hotel rooms and ancillary hotel areas.
<sup>c</sup> Based on an estimation of 640 square feet per hotel room provided by Thomas Properties Group, L.P.

*Source:* LAUSD, Student Generation Rate Calculation, August 2006.

It is likely that some of the students generated by the Project would already reside in areas served by LAUSD and would already be enrolled in LAUSD schools. However, for a conservative analysis, it is assumed that all students generated by the Project would be new to LAUSD. As previously discussed, two of the schools serving the Project Site are operating at or above capacity. The addition of 77 new elementary students to Castelar Elementary School and Gratts Elementary School would result in the schools surpassing their capacity for students. The addition of 41 middle school students at Liechty...
Middle School would not result in the school reaching or surpassing its capacities for students. Also, the addition of 41 high school students at Belmont Senior High School would further exacerbate an over-enrolled school. However, LAUSD is aware of the overcrowded conditions at area schools and has four schools, Central Los Angeles New Learning Center #1 ES/MS/HS (Quarter 3, 2010), Central Los Angeles Area New Middle School #3 (Completed), Central Los Angeles Area New High School #9 (Completed), and Gratts New PC (Quarter 3, 2010) planned for construction or recently completed to alleviate the overcrowded conditions. Further, pursuant to the California Government Code Section 17620, payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees, would, by law, mitigate the Project’s direct and indirect impacts on schools. Therefore, impacts on the schools identified to serve the Project would be less than significant.

d. Land Use Equivalency Program

The Project would include a Land Use Equivalency Program to maintain flexibility of Project uses and floor areas so that the Project could respond to the changing needs of the Southern California economy. The Land Use Equivalency Program defines a framework within which the proposed mix of land uses could be modified within the development envelope defined by the approved entitlements without resulting in any new significant impacts or a substantial increase in the severity of previously identified significant impacts as analyzed in this EIR.

Table IV.I.1-2 (Project Comparison with Highest On-Site Population Scenarios), shown previously, shows the potential impact on public services when the total employee and resident population generations are the highest possible under the Land Use Equivalency Program. Under the Land Use Equivalency Program, the development scenario with the highest on-site population would be realized if the hotel and office uses were exchanged to achieve the maximum amount of residential use of 1,100 residential dwelling units, as it would generate the greatest amount of population on-site for both employee and resident populations, 5,236 employees and 2,079 residents, respectively.

As shown on Table IV.I.3-3 (Estimated Student Generation of Highest On-Site Population Scenario), under the development scenario with the highest student generation, 401 students (194 elementary students, 105 middle school students, and 102 high school students) would be generated by the uses, which would represent a net increase of 366 students compared to the existing condition. However, this increased on-site population demand on school services would be mitigated by the payment of school fees. As such, implementation of the proposed Land Use Equivalency Program would result in a less than significant impact related to school service.

---

Table IV.I.3-3
Estimated Student Generation of Highest Student Generation Scenario

<table>
<thead>
<tr>
<th>Use Type</th>
<th>Amount of Development</th>
<th>School Type</th>
<th>Student Generation Factor</th>
<th>Total Students Generateda</th>
</tr>
</thead>
<tbody>
<tr>
<td>Multi-Family Residential</td>
<td>1,100 du</td>
<td>Elementary School (K-6)</td>
<td>0.1266 st/du</td>
<td>139</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Middle School (7-8)</td>
<td>0.0692 st/du</td>
<td>76</td>
</tr>
<tr>
<td></td>
<td></td>
<td>High School (9-12)</td>
<td>0.0659 st/du</td>
<td>73</td>
</tr>
<tr>
<td>Office</td>
<td>1,459,164 sf</td>
<td>Elementary School (K-6)</td>
<td>0.0000373 st/sf</td>
<td>54</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Middle School (7-8)</td>
<td>0.0000194 st/sf</td>
<td>28</td>
</tr>
<tr>
<td></td>
<td></td>
<td>High School (9-12)</td>
<td>0.0000192 st/sf</td>
<td>28</td>
</tr>
<tr>
<td>Fitness Center</td>
<td>20,000 sf</td>
<td>Elementary School (K-6)</td>
<td>0.000012 st/sf</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Middle School (7-8)</td>
<td>0.0000063 st/sf</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>High School (9-12)</td>
<td>0.0000062 st/sf</td>
<td>0</td>
</tr>
<tr>
<td>Retail/Restaurant</td>
<td>50,000 sf</td>
<td>Elementary School (K-6)</td>
<td>0.0000238 st/sf</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Middle School (7-8)</td>
<td>0.0000123 st/sf</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>High School (9-12)</td>
<td>0.0000123 st/sf</td>
<td>1</td>
</tr>
<tr>
<td><strong>Total Elementary School</strong></td>
<td></td>
<td></td>
<td></td>
<td><strong>194</strong></td>
</tr>
<tr>
<td><strong>Total Middle School</strong></td>
<td></td>
<td></td>
<td></td>
<td><strong>105</strong></td>
</tr>
<tr>
<td><strong>Total High School</strong></td>
<td></td>
<td></td>
<td></td>
<td><strong>102</strong></td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td></td>
<td></td>
<td></td>
<td><strong>401</strong></td>
</tr>
<tr>
<td><strong>Less Existing</strong></td>
<td></td>
<td></td>
<td></td>
<td>(35)</td>
</tr>
<tr>
<td><strong>Total Net New Students Generated</strong></td>
<td></td>
<td></td>
<td></td>
<td><strong>366</strong></td>
</tr>
</tbody>
</table>

Note: sf = square feet; du = residential dwelling unit; st = student
d. The number of students has been rounded to the nearest whole number.
Source: LAUSD, Student Generation Rate Calculation, August 2006.

3. CUMULATIVE IMPACTS

Implementation of the Project in combination with ambient growth and the related projects identified in Section III (Environmental Setting), would further increase demands on school services. There are a total of 92 related projects. Due to the various locations of the projects that have the potential to generate elementary, middle, or high school students, not all of the students generated would attend the same schools as students generated by the Project. The Project shares school service with 64 related projects; their impacts are described in Table IV.I.3-4 (Estimated Cumulative Student Generation).

e. Design Flexibility Program

The design of the Project as a conceptual plan allows for flexibility in the finalized building design within a determined set of parameters. Design alterations under the Design Flexibility Program would not impact school services as student generation would not be affected by design alterations.
## Table IV.I.3-4

**Estimated Cumulative Student Generation**

<table>
<thead>
<tr>
<th>Map No.</th>
<th>Location (Address)</th>
<th>Size (Address)</th>
<th>Description a</th>
<th>Elementary School Students</th>
<th>Middle School Students</th>
<th>High School Students</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Figueroa St./11th St.</td>
<td>345,000 sf 498,000 sf 165,000 sf 800 du</td>
<td>Restaurant Retail Office Apartments</td>
<td>8 12 6 101</td>
<td>4 6 3 55</td>
<td>4 6 3 52</td>
</tr>
<tr>
<td>7</td>
<td>1030 Mignonette St.</td>
<td>204 du 5,000 sf</td>
<td>Apartments Retail</td>
<td>26 0</td>
<td>14 0</td>
<td>13 0</td>
</tr>
<tr>
<td>9</td>
<td>2323 Olympic Blvd.</td>
<td>87 du 70,231 sf</td>
<td>Condominiums Retail</td>
<td>17 2</td>
<td>8 1</td>
<td>9 1</td>
</tr>
<tr>
<td>10</td>
<td>1076 W. 6th St.</td>
<td>600 du 20,000 sf</td>
<td>Condominiums Retail</td>
<td>117 0</td>
<td>56 0</td>
<td>63 0</td>
</tr>
<tr>
<td>12</td>
<td>110 N. Beaudry Ave.</td>
<td>200 du 5,000 sf</td>
<td>Apartments Retail</td>
<td>25 0</td>
<td>14 0</td>
<td>13 0</td>
</tr>
<tr>
<td>13</td>
<td>662 Lucas Ave.</td>
<td>311 du</td>
<td>Condominiums</td>
<td>61 0</td>
<td>29 0</td>
<td>33 0</td>
</tr>
<tr>
<td>15</td>
<td>948 S. Figueroa St.</td>
<td>156 du 7,500 sf</td>
<td>Apartments Retail</td>
<td>20 0</td>
<td>11 0</td>
<td>10 0</td>
</tr>
<tr>
<td>18</td>
<td>1301 S. Olive St.</td>
<td>105 du 4,500 sf</td>
<td>Condominiums Retail</td>
<td>21 0</td>
<td>10 0</td>
<td>11 0</td>
</tr>
<tr>
<td>20</td>
<td>500 N. Bunker Hill Ave.</td>
<td>17,000 sf 4,200 sf</td>
<td>Supermarket Retail</td>
<td>0 0</td>
<td>0 0</td>
<td>0 0</td>
</tr>
<tr>
<td>21</td>
<td>200 S. Los Angeles St.</td>
<td>570 du 280 du 50,000 sf</td>
<td>Condominiums Apartments Retail</td>
<td>112 35 1</td>
<td>53 19 1</td>
<td>60 10 1</td>
</tr>
<tr>
<td>22</td>
<td>900 S. Figueroa St.</td>
<td>629 du 27,000 sf</td>
<td>Condominiums Retail</td>
<td>123 1</td>
<td>59 0</td>
<td>67 0</td>
</tr>
<tr>
<td>24</td>
<td>851 S. Francisco St.</td>
<td>836 du 988,255 sf 480 rooms 46,000 sf</td>
<td>Condominiums Office Hotel Retail</td>
<td>164 37 NA 1</td>
<td>78 19 NA</td>
<td>89 19 NA</td>
</tr>
<tr>
<td>25</td>
<td>1st St./Main St.</td>
<td>350 seats 5,340 sf 1,640 units</td>
<td>Auditorium Restaurant Parking Structure</td>
<td>NA 0 NA</td>
<td>NA 0 NA</td>
<td>NA 0 NA</td>
</tr>
<tr>
<td>26</td>
<td>Cesar Chavez St./N. Broadway</td>
<td>280 du 22,000 sf</td>
<td>Apartments Retail</td>
<td>35 1</td>
<td>2 0</td>
<td>18 0</td>
</tr>
</tbody>
</table>
### Table IV.I.3-4
Estimated Cumulative Student Generation

<table>
<thead>
<tr>
<th>Map No.</th>
<th>Location (Address)</th>
<th>Size</th>
<th>Description a</th>
<th>Elementary School Students</th>
<th>Middle School Students</th>
<th>High School Students</th>
</tr>
</thead>
<tbody>
<tr>
<td>28</td>
<td>146 W. 11th St.</td>
<td>565 du 20 du 32,670 sf 37,600 sf</td>
<td>Condominiums Apartments Office Retail</td>
<td>110 3 1 1</td>
<td>52 1 1</td>
<td>60 1 1</td>
</tr>
<tr>
<td>29</td>
<td>W. 8th St./Grand Ave.</td>
<td>875 du 34,061 sf 10,000 sf</td>
<td>Condominiums Retail Restaurant</td>
<td>171 1 16 0</td>
<td>93 0 0</td>
<td>0 0</td>
</tr>
<tr>
<td>30</td>
<td>101 E. 6th St.</td>
<td>11,018 sf 8,927 sf 5,066 sf</td>
<td>Restaurant Retail Health Club</td>
<td>0 0 0</td>
<td>0 0 0</td>
<td>0 0</td>
</tr>
<tr>
<td>31</td>
<td>1234 W. 3rd St.</td>
<td>363 du 7,740 sf</td>
<td>Apartments Retail</td>
<td>46 0 25 0</td>
<td>24 0 0</td>
<td></td>
</tr>
<tr>
<td>32</td>
<td>2525 W. Wilshire Blvd.</td>
<td>118 du 3,000 sf</td>
<td>Condominiums Retail</td>
<td>23 0 11 0</td>
<td>13 0 0</td>
<td></td>
</tr>
<tr>
<td>33</td>
<td>454 E. Commercial St.</td>
<td>2 acres</td>
<td>Bus Facility</td>
<td>NA 0 NA</td>
<td>NA NA NA</td>
<td></td>
</tr>
<tr>
<td>34</td>
<td>1027 W. Wilshire Blvd.</td>
<td>402 du 4,728 sf</td>
<td>Condominiums Retail</td>
<td>79 0 38 0</td>
<td>43 0 0</td>
<td></td>
</tr>
<tr>
<td>35</td>
<td>1135 W. 7th St.</td>
<td>130 du 7,037 sf</td>
<td>Condominiums Retail</td>
<td>25 0 12 0</td>
<td>14 0 0</td>
<td></td>
</tr>
<tr>
<td>36</td>
<td>1311 W. 5th St.</td>
<td>80 du</td>
<td>Apartments</td>
<td>10 0 6 0</td>
<td>5 0 0</td>
<td></td>
</tr>
<tr>
<td>39</td>
<td>102 S. Grand Ave.</td>
<td>1,648 du 412 du 275 rooms 449 sf 68,000 sf</td>
<td>Condominiums Apartments Hotel Retail Gov’t Building</td>
<td>323 52 NA NA</td>
<td>154 29 NA NA</td>
<td>175 27 NA NA</td>
</tr>
<tr>
<td>40</td>
<td>939 S. Flower St.</td>
<td>95,700 sf 112 du</td>
<td>College Apartments</td>
<td>NA 14 NA</td>
<td>NA 8 NA</td>
<td></td>
</tr>
<tr>
<td>41</td>
<td>327 N. Fremont Ave.</td>
<td>600 du 30,000 sf</td>
<td>Apartments Retail</td>
<td>76 1 42 0</td>
<td>40 0 0</td>
<td></td>
</tr>
<tr>
<td>42</td>
<td>221 S. Los Angeles St.</td>
<td>300 du 3,400 sf</td>
<td>Condominiums Retail</td>
<td>59 0 28 0</td>
<td>32 0 0</td>
<td></td>
</tr>
<tr>
<td>44</td>
<td>1111 W. Wilshire Blvd.</td>
<td>420 du 40,000 sf</td>
<td>Condominiums Retail</td>
<td>82 1 39 0</td>
<td>45 0 0</td>
<td></td>
</tr>
</tbody>
</table>
Table IV.I.3-4
Estimated Cumulative Student Generation

<table>
<thead>
<tr>
<th>Map No.</th>
<th>Location (Address)</th>
<th>Size</th>
<th>Description a</th>
<th>Elementary School Students</th>
<th>Middle School Students</th>
<th>High School Students</th>
</tr>
</thead>
<tbody>
<tr>
<td>45</td>
<td>315 W. 9th St.</td>
<td>210 du 9,000 sf</td>
<td>Condominiums Retail</td>
<td>41</td>
<td>20</td>
<td>22</td>
</tr>
<tr>
<td>46</td>
<td>456 S. Witmer St.</td>
<td>39 du</td>
<td>Condominiums</td>
<td>8</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>47</td>
<td>720 W. Cesar Chavez Ave.</td>
<td>272 du 6,431 sf 8,000 sf</td>
<td>Condominiums Retail Restaurant</td>
<td>53</td>
<td>25</td>
<td>29</td>
</tr>
<tr>
<td>48</td>
<td>1360-1500 S. Figueroa St.</td>
<td>622 du</td>
<td>Condominiums</td>
<td>122</td>
<td>58</td>
<td>66</td>
</tr>
<tr>
<td>50</td>
<td>1247 W. 7th St.</td>
<td>186 du 6,200 sf</td>
<td>Condominiums Retail</td>
<td>36</td>
<td>17</td>
<td>20</td>
</tr>
<tr>
<td>52</td>
<td>1133 S Hope St.</td>
<td>159 du 6,827 sf</td>
<td>Condominiums Restaurant</td>
<td>31</td>
<td>15</td>
<td>17</td>
</tr>
<tr>
<td>53</td>
<td>745 S. Spring St.</td>
<td>247 du 10,675 sf</td>
<td>Condominiums Retail</td>
<td>48</td>
<td>23</td>
<td>26</td>
</tr>
<tr>
<td>54</td>
<td>300 S. Santa Fe Ave.</td>
<td>442 du 17 25,000 sf</td>
<td>Apartments Live/Work Units Retail</td>
<td>56</td>
<td>31</td>
<td>29</td>
</tr>
<tr>
<td>56</td>
<td>1115 S. Hill St.</td>
<td>172 du 6,850 sf</td>
<td>Condominiums Retail</td>
<td>34</td>
<td>16</td>
<td>18</td>
</tr>
<tr>
<td>58</td>
<td>905 E. 2nd St.</td>
<td>320 du 18,716 sf</td>
<td>Condominiums Retail</td>
<td>63</td>
<td>30</td>
<td>34</td>
</tr>
<tr>
<td>59</td>
<td>501 S. Olive St.</td>
<td>900 du 19,000 sf 19,200 sf</td>
<td>Condominiums Retail Restaurant</td>
<td>176</td>
<td>84</td>
<td>96</td>
</tr>
<tr>
<td>60</td>
<td>1901 W. 7th St.</td>
<td>172 du 32,800 sf</td>
<td>Apartments Retail</td>
<td>22</td>
<td>12</td>
<td>11</td>
</tr>
<tr>
<td>61</td>
<td>1155 S. Grand Ave.</td>
<td>374 du 17,500 sf</td>
<td>Condominiums Retail</td>
<td>73</td>
<td>35</td>
<td>40</td>
</tr>
<tr>
<td>63</td>
<td>3200 W. Beverly Blvd.</td>
<td>32 du 5,870 sf</td>
<td>Apartments Retail</td>
<td>4</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>67</td>
<td>418 S. Spring St.</td>
<td>96 du 122 rooms 10,000 sf 2,000 sf 3,500 sf</td>
<td>Condominiums Hotel Retail Health Club Bar</td>
<td>19 NA</td>
<td>9 NA</td>
<td>10 NA</td>
</tr>
</tbody>
</table>

a: Description of the type of student generation.
Table IV.I.3-4
Estimated Cumulative Student Generation

<table>
<thead>
<tr>
<th>Map No.</th>
<th>Location (Address)</th>
<th>Size</th>
<th>Description a</th>
<th>Elementary School Students</th>
<th>Middle School Students</th>
<th>High School Students</th>
</tr>
</thead>
<tbody>
<tr>
<td>68</td>
<td>431 S. Lucas Ave.</td>
<td>75 du</td>
<td>Apartments</td>
<td>9</td>
<td>5</td>
<td>5</td>
</tr>
<tr>
<td>70</td>
<td>715 N. Yale St.</td>
<td>65 du</td>
<td>Apartments</td>
<td>8</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>71</td>
<td>1600 W. Olympic Blvd.</td>
<td>8 fuelpumps</td>
<td>Gas Station with Mini-Mart</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>72</td>
<td>1136 W. 6th St.</td>
<td>725 du39,999 sf</td>
<td>Apartments Retail</td>
<td>92</td>
<td>50</td>
<td>6</td>
</tr>
<tr>
<td>73</td>
<td>1200 W. Colton St.</td>
<td>25,500 sf350 seats</td>
<td>Office Conference Center</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>74</td>
<td>860 S. Olive St.</td>
<td>255 du98 du19,900 sf6,000 sf</td>
<td>Condominiums Live/Work Units Retail Restaurant</td>
<td>50</td>
<td>24</td>
<td>27</td>
</tr>
<tr>
<td>76</td>
<td>609 W. 8th St.</td>
<td>225 du200 rooms30,000 sf32,000 sf</td>
<td>Condominiums Hotel Retail Restaurant</td>
<td>44</td>
<td>21</td>
<td>24</td>
</tr>
<tr>
<td>77</td>
<td>820 S. Hoover St.</td>
<td>32 du4,500 sf</td>
<td>Condominiums Retail</td>
<td>6</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>78</td>
<td>1340 S. Olive St.</td>
<td>150 du</td>
<td>Condominiums</td>
<td>29</td>
<td>14</td>
<td>16</td>
</tr>
<tr>
<td>79</td>
<td>1924 W. Temple St.</td>
<td>132 du73 du46 du19,103 sf</td>
<td>Condominiums Condominiums Apartments Retail</td>
<td>26</td>
<td>12</td>
<td>14</td>
</tr>
<tr>
<td>80</td>
<td>2300 W. 7th St.</td>
<td>400 students</td>
<td>Elementary School</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>82</td>
<td>601 S. Main St.</td>
<td>777 du25,000 sf</td>
<td>Condominiums Retail</td>
<td>152</td>
<td>72</td>
<td>83</td>
</tr>
<tr>
<td>83</td>
<td>1525 S. Grand Ave.</td>
<td>64,734 sf</td>
<td>Medical Office</td>
<td>2</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>84</td>
<td>1340 S. Figueroa St.</td>
<td>237 du10,000 sf9,000 sf</td>
<td>Condominiums Health Club Restaurant</td>
<td>46</td>
<td>22</td>
<td>25</td>
</tr>
<tr>
<td>85</td>
<td>1130 W. Wilshire Blvd.</td>
<td>86,844 sf</td>
<td>Office</td>
<td>3</td>
<td>2</td>
<td>2</td>
</tr>
</tbody>
</table>
Sixty-four related projects have the potential to generate students and would produce a total of approximately 3,514 elementary school students, 1,645 middle school students, and 1,831 high school students that would attend the same local elementary, middle, and senior high schools as those generated by the Project.

Similar to the 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. In order to provide a conservative analysis, however, it is assumed that all of the students generated by the related projects would be new to the LAUSD.

The related projects would generate additional students at Castelar Elementary, Gratts Elementary, Liechty Middle School, and Belmont Senior High School as shown in Table IV.I.3-5 (Cumulative Impacts on LAUSD Schools Serving the Project). This would result in a potentially significant cumulative impact on school services. However, as discussed previously LAUSD is aware of the overcrowded conditions at area schools and has four schools, Central Los Angeles New Learning Center #1 ES/MS/HS, Central Los Angeles Area New Middle School #3, Central Los Angeles Area New High

---

**Table IV.I.3-4**

Estimated Cumulative Student Generation

<table>
<thead>
<tr>
<th>Map No.</th>
<th>Location (Address)</th>
<th>Size</th>
<th>Description a</th>
<th>Elementary School Students</th>
<th>Middle School Students</th>
<th>High School Students</th>
</tr>
</thead>
<tbody>
<tr>
<td>86</td>
<td>920 N. Vignes St.</td>
<td>647 Employees</td>
<td>Bus Facility</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>87</td>
<td>1050 S. Grand Ave.</td>
<td>151 du 3,472 sf, 2,200 sf</td>
<td>Condominiums Retail Restaurant</td>
<td>30</td>
<td>14</td>
<td>16</td>
</tr>
<tr>
<td>88</td>
<td>848 S. Grand Ave.</td>
<td>420 du 38,500 sf</td>
<td>Condominiums Retail</td>
<td>82</td>
<td>39</td>
<td>45</td>
</tr>
<tr>
<td>89</td>
<td>240 S. Hill St.</td>
<td>330 du 12,000 sf</td>
<td>Condominiums Retail</td>
<td>65</td>
<td>31</td>
<td>35</td>
</tr>
<tr>
<td>90</td>
<td>1430 W. Beverly Blvd.</td>
<td>157 du</td>
<td>Apartments</td>
<td>20</td>
<td>11</td>
<td>10</td>
</tr>
<tr>
<td>92</td>
<td>755 S. Figueroa St.</td>
<td>792,000 sf</td>
<td>Office</td>
<td>30</td>
<td>15</td>
<td>15</td>
</tr>
</tbody>
</table>

**Related Projects Net Total**

| | 3,514 | 1,645 | 1,831 |

**Project Net Total**

| | 77 | 41 | 41 |

**Cumulative Net Total (Related Projects + Project Total)**

| | 3,591 | 1,686 | 1,872 |

*The number of students has been rounded to the nearest whole number.*

*Source: LAUSD, Student Generation Rate Calculation, August 2006.*

School # 9, and Gratts New PC planned for construction to alleviate the overcrowded conditions. Further, similar to the Project, the applicants of the related commercial and residential projects would be expected to pay required developer school fees to the LAUSD to help reduce any impacts they may have on school services. Pursuant to SB 50, payment of developer fees is deemed to provide full and complete mitigation of school facilities impacts. The payment of these fees by the Project and the related projects would be mandatory and would reduce the cumulative impact on school services to a less than significant level.

### Table IV.I.3-5
**Cumulative Impacts on LAUSD Schools Serving the Project**

<table>
<thead>
<tr>
<th>School</th>
<th>Projected Capacity a</th>
<th>Projected Enrollment b</th>
<th>Cumulative Students</th>
<th>Project Enrollment with Cumulative Students</th>
<th>(-) Under/ (+) Over Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Castelar Elementary School</td>
<td>687</td>
<td>623</td>
<td>77</td>
<td>475</td>
<td>+488</td>
</tr>
<tr>
<td>Gratts Elementary School</td>
<td>602</td>
<td>780</td>
<td>77</td>
<td>842</td>
<td>+1,097</td>
</tr>
<tr>
<td>Liechty Middle School</td>
<td>1784</td>
<td>1,483</td>
<td>41</td>
<td>779</td>
<td>+519</td>
</tr>
<tr>
<td>Belmont Senior High School and</td>
<td>NA</td>
<td>7,683</td>
<td>41</td>
<td>1,759</td>
<td>+1,800 (over projected enrollment)</td>
</tr>
<tr>
<td>Option Area</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

a Capacity based on implementing operational goals such as full-day kindergarten and class-size reduction.
b Based on 2008-2009 LAUSD student enrollment history.

Source: Letter Correspondence with Rena Perez, Director, Master Planning and Demographics, LAUSD, October 8, 2009. Appendix IV.I.3.


### 4. PROJECT DESIGN FEATURES AND MITIGATION MEASURES

No project design features related to school services are proposed.

Pursuant to SB 50, the following mitigation measure is required:

**MM-12:** The Applicant or its successor shall pay all required school fees to the LAUSD.

### 5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts on school services would be less than significant.
This Subsection describes the potential impacts of the Project on parks and recreation services in the Project area. This Subsection’s analysis is based on the following correspondence with the City of Los Angeles Department of Recreation and Parks, which can be found in Appendix IV.I.4:

- City of Los Angeles Department of Recreation and Parks Response Letter, Jon Kirk Mukri, General Manager, Michael A. Shull, Superintendent, Planning and Construction, November 5, 2009.

1. ENVIRONMENTAL SETTING

   a. Existing Parks and Recreational Facilities

   b. Regulatory Framework

      i. **State of California**

         (1) *State Quimby Act*

      ii. **City of Los Angeles**

         (1) *Quimby Fees*

         (2) *Dwelling Unit Construction Tax*

         (3) *Code Required Open Space*

         (4) *General Plan Framework Element*

         (5) *Public Recreation Plan*

         (6) *Central City Community Plan*

         (7) *Open Space Element*

         (8) *Conservation Element*

2. ENVIRONMENTAL IMPACTS

   a. Methodology

   b. Thresholds of Significance
c. Project Impacts
d. Land Use Equivalency Program
e. Design Flexibility Program

3. CUMULATIVE IMPACTS

4. PROJECT DESIGN FEATURES AND MITIGATION MEASURES

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION
1. ENVIRONMENTAL SETTING

a. Existing Parks and Recreational Facilities

The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City, which include approximately 15,710 acres of parkland between 390 neighborhood and regional parks, nine lakes, 176 recreation centers, 372 children’s play areas, 13 golf courses, 287 tennis courts, nine dog parks, 59 swimming pools, seven skate parks, seven museums, 24 child care facilities, 30 senior centers, two beaches, and an urban forest containing approximately one million trees. Table IV.I.4-1 (Parks and Recreation Facilities Serving the Project Area) lists the approximately 20 neighborhood parks, recreation centers, and regional parks located within the Central City Community Plan (the “Community Plan”) area, as provided by the Los Angeles Citywide General Plan Framework EIR serving the Project Site. The Community Plan area provides approximately 0.1 acres of open space and recreation per 1,000 people.

As shown in Table IV.I.4-1 (Parks and Recreation Facilities Serving the Project Area), the Project is located within the two-mile service radius of MacArthur Park, City Hall Park, Lake Street Park, Father Serra Park, Los Angeles Plaza Park, Terrace Park, Echo Park, Grace E. Simons Lodge, Everett Park, Hope and Peace Park, Lafayette Park, 6th & Gladys Street Park, Alvarado Terrace Park, Pershing Square, Maguire Gardens, Saint James Park, and Pico Union Park. The Project is also within the two-mile Service radius of Toberman Recreation Center, Trinity Recreation Center, MacArthur Park Recreation Center, Echo Park Recreation Center, Lafayette Park Recreation Center, Hoover Recreation Center, and Alpine Recreation Center.

The parks serving the Project include facilities such as auditoriums, waterways with aquatic recreation facilities, children’s areas, sports fields, seasonal ice skating, and picnic areas. The recreation centers serving the Project site provide facilities including auditoriums, barbeque areas, lighted and indoor basketball courts, community rooms, sports programs, classrooms, aquatic recreation centers, and gymnasiums. The locations of the parks and recreation centers that serve the Project Site are shown on Figure IV.I.4-1 (Park and Recreation Center Locations).

b. Regulatory Framework

i. State of California

(1) State Quimby Act

California Government Code Section 66477 (Quimby Act) authorized cities and counties to enact ordinances that would require the dedication of land or payment of fees in lieu of parkland dedication for park or recreational purposes for projects involving residential subdivisions. Quimby fees do not, however, apply to commercial or industrial developments, or residential developments that do not include subdivisions. The Quimby Act states that the dedication of land, the payment of fees, or both, shall not exceed the proportionate amount necessary to provide three acres of park area per 1,000 persons residing within a subdivision, unless the amount of existing neighborhood or community park area exceeds that limit.
Table IV.I.4-1
Parks and Recreation Facilities Serving the Project Area

<table>
<thead>
<tr>
<th>Park/Recreation Facility Name</th>
<th>Location</th>
<th>Approximate Distance to the Project Site (miles)</th>
<th>Service Radius (miles)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Parks</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>MacArthur Park</td>
<td>2230 W. 6th St.</td>
<td>1.3</td>
<td></td>
</tr>
<tr>
<td>City Hall Park</td>
<td>200 N. Spring St.</td>
<td>1.5</td>
<td></td>
</tr>
<tr>
<td>Lake Street Park</td>
<td>227 N. Lake St.</td>
<td>2.0</td>
<td></td>
</tr>
<tr>
<td>Father Serra Park</td>
<td>125 Paseo De La Plaza</td>
<td>2.0</td>
<td></td>
</tr>
<tr>
<td>Los Angeles Plaza Park</td>
<td>125 Paseo De La Plaza</td>
<td>2.0</td>
<td></td>
</tr>
<tr>
<td>Terrace Park</td>
<td>Malvern Ave. and Alvarado Terrace</td>
<td>1.9</td>
<td></td>
</tr>
<tr>
<td>Echo Park</td>
<td>1632 Bellevue Ave.</td>
<td>1.7</td>
<td></td>
</tr>
<tr>
<td>Grace E. Simons Lodge</td>
<td>1025 Elysian Park Dr.</td>
<td>2.0</td>
<td></td>
</tr>
<tr>
<td>Everett Park</td>
<td>Everett and Sunset Blvd.</td>
<td>1.6</td>
<td></td>
</tr>
<tr>
<td>Hope and Peace Park</td>
<td>843 S. Bonnie Brae St.</td>
<td>1.2</td>
<td></td>
</tr>
<tr>
<td>Lafayette Park</td>
<td>2830 W. 6th St.</td>
<td>1.7</td>
<td></td>
</tr>
<tr>
<td>6th &amp; Gladys Street Park</td>
<td>6th St and Gladys St.</td>
<td>1.3</td>
<td></td>
</tr>
<tr>
<td>Alvarado Terrace Park</td>
<td>200 N. Spring St.</td>
<td>1.5</td>
<td></td>
</tr>
<tr>
<td>Pershing Square Park</td>
<td>525 S. Olive St.</td>
<td>0.5</td>
<td></td>
</tr>
<tr>
<td>Maguire Gardens</td>
<td>630 W. 5th St.</td>
<td>0.2</td>
<td></td>
</tr>
<tr>
<td>Saint James Park</td>
<td>20 S. St James Park</td>
<td>1.7</td>
<td></td>
</tr>
<tr>
<td>Pico Union Park</td>
<td>1827 S. Hoover St.</td>
<td>1.6</td>
<td></td>
</tr>
<tr>
<td>Recreation Centers</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Toberman Recreation Center</td>
<td>1725 Toberman St.</td>
<td>1.7</td>
<td></td>
</tr>
<tr>
<td>Trinity Recreation Center</td>
<td>2416 Trinity St.</td>
<td>2.0</td>
<td></td>
</tr>
<tr>
<td>MacArthur Park Recreation Center</td>
<td>2230 W. 6th St.</td>
<td>1.3</td>
<td></td>
</tr>
<tr>
<td>Echo Park Recreation Center</td>
<td>1632 Bellevue Ave.</td>
<td>1.7</td>
<td></td>
</tr>
<tr>
<td>Lafayette Park Recreation Center</td>
<td>2830 W. 6th St.</td>
<td>1.8</td>
<td></td>
</tr>
<tr>
<td>Hoover Recreation Center</td>
<td>1010 W. 25th St.</td>
<td>1.8</td>
<td></td>
</tr>
<tr>
<td>Alpine Recreation Center</td>
<td>817 Yale St.</td>
<td>1.4</td>
<td></td>
</tr>
</tbody>
</table>

Figure IV.I.4-1

Park and Recreation Center Locations

ii. City of Los Angeles

(1) Quimby Fees

Pursuant to LAMC Section 21.10.3, the City imposes a mandatory dwelling unit construction excise tax to reduce impacts on parks and recreational facilities. The tax collected pursuant to this ordinance is placed in a “Park and Recreational Sites and Facilities Fund,” used exclusively for the acquisition and development of park and recreational sites and facilities. Any future residential development on the Project Site would be subject to this fee.

Furthermore, since the Project could include “for sale” units, the relevant provisions of LAMC Section 17.12 may also apply, requiring the Applicant to pay applicable in lieu fees to the City for the construction of condominium uses. The City’s in lieu fee provision meets the requirements set by the state under the Quimby Act; these fees are sometimes referred to as “Quimby fees.”

Quimby fees are used to acquire necessary land and/or develop new neighborhood and community parks or recreation facilities that would reasonably serve each residential project. Although both LAMC Sections 21.10.3 and 17.12 fees may apply to the Project, each has a provision to allow a credit where the other fee has been paid, in order to avoid a doubling of payment.

(2) Dwelling Unit Construction Tax

Pursuant to LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax), the City imposes a tax of $200 per dwelling unit on all construction of new dwelling units and modification of existing dwelling units to be paid to the City of Los Angeles Department of Building and Safety. These taxes are placed into a “Park and Recreational Sites and Facilities Fund” to be used exclusively for the acquisition and development of park and recreational sites. If a developer has already paid Quimby fees, as described under LAMC Section 17.12, or has dedicated in lieu parkland or recreational facilities, the dwelling unit tax may be reduced accordingly.

(3) Code Required Open Space

The LAMC provides minimum standards for the amount of “open space” that residential development projects should provide on-site. Open space includes both common and private greenspace and recreational amenities that meet specific standards. However, not all areas designated as open space in the LAMC would be classified as park or recreational facilities under the City’s Quimby and Parkland fee programs (discussed previously), under the General Plan Framework Element, or the LADRP.

Pursuant to LAMC Section 12.21(G), new construction in the City of six or more dwelling units on a lot is required to provide at a minimum 100 square feet of usable open space for each dwelling unit having less than three habitable rooms; 125 square feet for each dwelling unit having three habitable rooms; and 175 square feet for each dwelling unit having more than three habitable rooms. Usable open space is defined as area that is designed and intended to be used for active or passive. Usable open space may consist of private and/or common area open space; however, common open space areas must be a minimum of 400 square feet, be open to the sky, have no structures that project into the common open
space area, be readily accessible to all residents of the site and must constitute at least 50 percent of the total open space provided. Open space does not generally include parking areas, driveways, or required front and side yards. A minimum of 25 percent of the common open space area shall be planted with ground cover, shrubs, or trees and at least one 24-inch box tree is required for every four dwelling units.

(4) General Plan Framework Element

The City’s General Plan Framework Element categorizes parks into three types: neighborhood, community, and regional. Ideally, neighborhood parks are five to ten acres in size, have a service radius of approximately 0.5 mile, and a minimum of two acres of neighborhood parkland should be provided for every 1,000 residents with equal distribution throughout the City. Community parks are ideally 15 to 20 acres, have a service radius of two miles. Regional parks in the City are ideally greater than 50 acres, provide specialized recreational facilities and/or attractions, have a service radius encompassing the entire City region, and a minimum of six acres of regional parkland should be provided for every 1,000 residents with equal distribution throughout the City.24

The General Plan Framework Element provides the City’s standard long-range (minimum) ratios for parks to population. The City’s standard minimum ratio of parks to population is two acres per 1,000 residents for neighborhood parks, one acre per 1,000 residents for community parks, and four acres per 1,000 residents of combined neighborhood and community parks.

(5) Public Recreation Plan

The City’s Public Recreation Plan notes that the long-range standards under the General Plan Framework Element may not be reached during the life of the plan and, therefore, include more attainable short-term and intermediate-range standards of one acre per 1,000 residents for neighborhood and community parks, or two acres per 1,000 residents combined.

(6) Central City Community Plan

The Community Plan sets open space goals through objectives designed to encourage the expansion and addition of parks and recreational facilities in the City’s downtown area. Policies in the Community Plan provide for the review of existing open space standards to expand and connect open spaces in Central City. Neighborhood parks in Central City should be within a quarter mile or five minutes walking distance to accommodate residents and designed in accordance with existing neighborhood character.

(7) Open Space Element

The Open Space Element of the General Plan provides an official guide for the identification, preservation, conservation, and acquisition of open space within the City. The Open Space Element uses

a standard of six acres per 1,000 persons for regional parks. The standards for neighborhood and community parks are the same as those identified under the City’s *Public Recreation Plan*.

(8) Conservation Element

The Conservation Element of the General Plan sets forth goals, objectives, policies, and programs emphasizing the conservation and preservation of natural resources. These goals are focused on the resource conservation and management of agricultural lands; animal keeping, nurseries, and crop gardens; archaeological and paleontological resources; cultural and historical resources, and endangered species.

2. ENVIRONMENTAL IMPACTS

a. Methodology

The environmental impacts of a project with respect to parks and recreational facilities are determined based on the ability of existing parks and recreational facilities in a project area to accommodate a project’s needs for such facilities. This is calculated based on the City’s recommended ratios for parkland to population as well as project-specific recommendations of the LADRP. Based on this evaluation, a determination is made whether a project would create substantial demands on existing parks and recreational facilities such that new or expanded parks and recreational facilities would be needed either on-site or off-site.

b. Thresholds of Significance

The *L.A. CEQA Thresholds Guide* (page K.4-3) states that a determination of significance relative to recreation and parks shall be made on a case-by-case basis, considering the following factors:

- The net population increase resulting from the Project;
- 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 (renovation, expansion, or addition) and the Project’s proportional contribution to the demand; and
- Whether the Project includes features that would reduce the demand for recreation and park services (e.g., on-site recreation facilities, land dedication or direct financial support to the Department of Recreation and Parks).

Based on all of these factors, the Project would have a significant impact if:

- The Project would generate demand for park and recreational facilities that cannot be adequately accommodated by existing or planned facilities and services; or
- Project construction would interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project area.
c. Project Impacts

Open space shall be provided in accordance with LAMC Section 12.21(G)(2), which requires at minimum 100 square feet for each unit having less than three habitable rooms, 125 square feet for each unit having three habitable rooms, and 175 square feet for each unit having more than three habitable rooms.\textsuperscript{25} Usable open space is defined as area that is designed and intended for active or passive recreation. Usable open space may consist of private and/or common area open space. However, common open space areas must be a minimum of 400 square feet and must constitute at least 50 percent of the total open space provided. Open space does not generally include parking areas, driveways, or required front and side yards. A minimum of 25 percent of the common open space area shall be planted with ground cover, shrubs or trees and at least one, 24-inch box tree is required for every four dwelling units.

The Project includes up to 100 residential dwelling units and approximately 20,782 square feet of open space comprised of 7,350 square feet of common open space at the podium level, including an outdoor plaza constructed at the corner of 7\textsuperscript{th} Street and Figueroa Street, 8,432 square feet of common open space at the rooftop level, and approximately 5,000 square feet of private balconies (refer to Section II [Project Description], Figure II-13 [Conceptual Site Plan – Landscape]). Additionally, the Project would include landscaped parkways, planted trellises, and street trees around the perimeter of the Project Site. Assuming the maximum required 175 square feet of open space per dwelling unit, the Project provides approximately 3,282 square feet more open space than required under LAMC Section 12.21(G)(2).

The standard minimum parkland-to-resident ratio provided in the City’s Public Recreation Plan is one acre per 1,000 residents for neighborhood parks and two acres per 1,000 residents for community parks. It is estimated that the development of the Project would result in an increase of approximately 189 residents. Based on the parkland-to-resident ratio, the Project would generate a need for approximately 0.19 additional acre of public parkland in the Project area. However, to alleviate the demand on City parks and recreational facilities, the Applicant would be required to pay Quimby fees to the City to satisfy its obligations under the Quimby Act and/or payment of a Dwelling Unit Construction Tax. Therefore, with the fulfillment of the City code-required open space on-site, payment of Quimby, fees and/or the Dwelling Unit Construction Tax to the City, impacts to parks and recreational facilities would be less than significant.

d. Land Use Equivalency Program

The Project would include a Land Use Equivalency Program to maintain flexibility of Project uses and floor areas so that the Project could respond to the changing needs of the Southern California economy. The Land Use Equivalency Program defines a framework within which the proposed mix of land uses could be modified within the development envelope defined by the approved entitlements without resulting in any new significant impacts or a substantial increase in the severity of previously identified significant impacts as analyzed in this EIR.

\textsuperscript{25} Kitchen and dining areas are not counted towards habitable space, LAMC Sections 12.21(G)(2) and 12.03.
Table IV.I.1-2 (Project Comparison with Highest On-Site Population Scenarios), shown previously, shows the potential impact on public services when the total employee and resident population generations are the highest possible under the Land Use Equivalency Program. Under the Land Use Equivalency Program, the development scenario with the highest on-site population would be realized if the hotel and office uses were exchanged to achieve the maximum amount of residential use of 1,100 residential dwelling units, as it would generate the greatest amount of population on-site for both employee and resident populations, 5,236 employees and 2,079 residents, respectively.

Any development under the Land Use Equivalency Program would be required to comply with the open space requirements of the LAMC, and as such, open space provided at the Project Site would be adequate. This increased population demand on park services would be mitigated by the payment Quimby fees and/or payment of a Dwelling Unit Construction Tax. Thus, impacts related to parks and recreational services under the Land Use Equivalency Program would be less than significant.

**e. Design Flexibility Program**

The design of the Project as a conceptual plan allows for flexibility in the finalized building design within a determined set of parameters. The Design Flexibility Program includes an outdoor plaza of not less than one quarter acre, which would also function as common open space for residents. Design alterations under the Design Flexibility Program would not impact parks and recreational services as resident generation would be similar to that of the Project. Therefore, with payment of parks fees, impacts related to the Design Flexibility Program would be less than significant.

**3. CUMULATIVE IMPACTS**

Implementation of the Project in conjunction with the 92 related projects identified in Section III (Environmental Setting), would further increase demand for park services. Employees generated by the commercial projects would not typically enjoy long periods of time during the workday to visit parks and/or recreational facilities, and would therefore not contribute to the future demand on park services. However, the increase in residential population by the related projects would increase the demand for parks and recreation facilities and further impact the shortage of park/recreational space in the Central City area. Future impacts on park facilities would be partially mitigated through the collection of park fees on new development and the provision of parkland. However, existing deficiencies would not be addressed by these fees. In accordance with State CEQA Guidelines Section 15130(a)(3), the Project’s contribution to the cumulative impact would be rendered less than cumulatively considerable through adherence to the City’s impact fee program for new development. Similarly, cumulative impacts would be further mitigated through payment of applicable parkland fees. Adherence to the requirements of this program would constitute implementation or funding of the Project’s fair share of measures designed to alleviate the cumulative impact.
4. PROJECT DESIGN FEATURES AND MITIGATION MEASURES

No project design features related to parks and recreational services are proposed. No significant impacts related to parks and recreational services have been identified, however, the City requires implementation of the following Standard Mitigation Measure:

**MM-13:** The Applicant or its successor shall pay all applicable fees associated with the construction of the Project, including, but not necessarily limited to, Quimby fees, in accordance with the provisions applicable to each fee.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts on parks and recreational services would be less than significant.
IV. ENVIRONMENTAL IMPACT ANALYSIS
   I. PUBLIC SERVICES
      5. LIBRARIES

This Subsection describes the potential impacts of the Project on library services in the Project area. This Subsection’s analysis is based on the following correspondence with the City of Los Angeles Public Library, which can be found in Appendix IV.I.5:

- City of Los Angeles Public Library Response Letter, Anne Connor, Central Library Director, August 28, 2009.

1. ENVIRONMENTAL SETTING
   a. Existing Library Facilities
      i. Central Library
   b. Regulatory Framework

2. ENVIRONMENTAL IMPACTS
   a. Methodology
   b. Thresholds of Significance
   c. Project Impacts
   d. Land Use Equivalency Program
   e. Design Flexibility Program

3. CUMULATIVE IMPACTS

4. PROJECT DESIGN FEATURES AND MITIGATION MEASURES

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION
1. ENVIRONMENTAL SETTING

a. Existing Library Facilities

The City of Los Angeles Public Library (LAPL) provides library services throughout the City, which includes the Central Library, eight regional branch libraries, 71 community branches, and four bookmobile units. According to the L.A. CEQA Thresholds Guide (2006), approximately six million books and other materials comprise the LAPL collection, of which 2.2 million are located in the Central Library. According to the Citywide General Plan Framework EIR, libraries in the City are mandated to include certain facility sizes based on service population and have a maximum service radius of two miles. The library that serves the Project Site is the Central Library located at 630 5th Street. The location of this library is shown in Figure IV.I.3-1, (Schools and Library Serving the Project Site). Other libraries that may serve the Project include the Chinatown Branch Library located at 639 Hill Street and the Little Tokyo Branch Library located at 203 Los Angeles Street. The Central, Chinatown, and Little Tokyo Libraries include resources for children, Spanish language speakers, teenagers, as well as free access to computer workstations.

The LAPL Branch Facilities Plan (the “Plan”), adopted in 1988, sets standards for site selection of libraries and identified a list of projects in which existing branch libraries are to be renovated or new facilities constructed in order to bring library resources to the residents of the City in accordance with the standards in the Plan. The goals of the Plan were implemented with money received by two bond issues: Phase I of the Plan was implemented with funds from the 1989 Bond Program and Phase II by the 1998 Bond Program. Under the two bond programs, 64 library facilities have been renovated or built. As of October 2008, all of the projects identified under the Plan have been completed. At present, the Plan is going through a process of revision in which the list of projects for the LAPL through the year 2030 will be updated.

i. Central Library

The Central Library would serve the Project. It is located at 630 5th Street, approximately 0.6 mile east of the Project Site. At present, the Central Library is 500,000 square feet and serves approximately 7,000

26 LAPL, Los Angeles Public Library Strategic Plan 2007-2010, page 22.


28 Los Angeles Citywide General Plan Framework EIR, Figure K-1, page 2.13-8, January 1995.


30 Ibid.

31 Ibid.
people per day. According to 2008 data provided by the Department of City Planning, the same service area, which encompasses the Project Site, had a total population of approximately 31,849 persons.\textsuperscript{32} At 500,000 square feet, the Central Library meets and exceeds the current demand for library services in the community. The Central Library is open seven days and four nights a week. Currently, the Central Library houses approximately six million items and is staffed with 180 staff positions. It presently has resources for children, teens, adults, and Spanish speakers. The Central Library also provides free wireless internet access. Similar to every branch of the LAPL, the Central Library offers free use of computer workstations that provide access to the LAPL’s information network. These workstations also provide internet access, the ability to search the LAPL online catalog, subscription databases, word processing and language learning tools, access to an historic document and photograph collection, and access to specially designed websites for children, teens, and Spanish speakers.

\textbf{b. Regulatory Framework}

The City’s library policy is guided by the Plan, an element of the City’s General Plan. The Board of Library Commissioners adopted a fully revised Plan on February 8, 2007. This Plan includes guidelines for the construction of branch libraries and specifies standards in defining facility size. According to the current Plan, service criteria are based on floor area required to serve varying amounts of residential population. Current LAPL branch building size standards are presented in Table IV.I.5-1 (LAPL Branch Facilities Site Selection Criteria).

\begin{table}[h]
\centering
\begin{tabular}{|c|c|c|}
\hline
Population Served & Size of Facility in square feet (sf.) & Property Required in square feet (sf.) \\
\hline
Above 50,000 & 12,500 & 32,500 \\
\hline
Below 50,000 & 10,500 & 27,500 \\
\hline
Expansion or Special Situation\textsuperscript{a} & Special Size & n/a \\
\hline
Regional Branch & 20,000 & 52,000 \\
\hline
\end{tabular}
\caption{LAPL Branch Facilities Site Selection Criteria}
\end{table}

\textsuperscript{a} Due to available property size and configuration, architectural constraints or opportunities, or building code requirements, some facilities may differ from the recommended sizes.


Additionally, the General Plan Framework EIR recommends use of the State of California standards of 0.5 square feet of facility space per capita and two volumes of permanent collection per resident.\textsuperscript{33}

\textsuperscript{32} Central City Community Plan Area, Local Population and Housing Profile. Department of City Planning Demographic Research Unity, November 2009.

2. ENVIRONMENTAL IMPACTS

a. Methodology

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

b. Thresholds of Significance

The L.A. CEQA Thresholds Guide (page K.5-2) states that a determination of significance relative to libraries shall be made on a case-by-case basis, considering the following factors:

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

Based on all of these factors, the Project would have a significant impact if the Project would generate demand for library facilities or services that would cause an increase in community population that would cause the either of the following to occur: (1) exceed the capacity of local libraries to adequately serve the existing residential population, based on LAPL-defined target service populations; or (2) substantially increase the demand for library services for which current demand already exceeds the ability of a facility to adequately serve the population, based on LAPL-defined target service populations.

c. Project Impacts

The Project Site would be served by the Central Library located at 630 5th Street. As discussed in Section IV.N (Population, Housing and Employment), the Project is expected to generate approximately 189 residents. At 500,000 square feet, the Central Library exceeds the proposed new regional branch building size criteria defining a regional branch as up to 20,000 square feet in size. Additionally, pursuant to state standards described previously, the Project’s resident population would be expected to generate the need for approximately 95 square feet of library facility space and 378 volumes of permanent collection

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that would be accommodated by the Central Library. Further, according to the LAPL, buildout of the Project would not have a potentially significant impact on library services.

d. Land Use Equivalency Program

The Project would include a Land Use Equivalency Program to maintain flexibility of Project uses and floor areas so that the Project could respond to the changing needs of the Southern California economy. The Land Use Equivalency Program defines a framework within which the proposed mix of land uses could be modified within the development envelope defined by the approved entitlements without resulting in any new significant impacts or a substantial increase in the severity of previously identified significant impacts as analyzed in this EIR.

Table IV.I.1-2 (Project Comparison with Highest On-Site Population Scenarios), shown previously, shows the potential impact on public services when the total employee and resident population generations are the highest possible under the Land Use Equivalency Program. Under the Land Use Equivalency Program, the development scenario with the highest on-site population would be realized if the hotel and office uses were exchanged to achieve the maximum amount of residential use of 1,100 residential dwelling units, as it would generate the greatest amount of population on-site for both employee and resident populations, 5,236 employees and 2,079 residents, respectively.

According to the state standards, this increased population demand on library services would generate the need for approximately 1,355 square feet of facility space and 5,418 volumes of permanent collection. At 500,000 square feet, the Central Library has adequate facilities to serve the additional residents generated under the Land Use Equivalency Program. Therefore, implementation of the Land Use Equivalency Program would result in a less than significant impact related to library service.

e. Design Flexibility Program

The design of the Project as a conceptual plan allows for flexibility in the finalized building design within a determined set of parameters. Design alterations under the Design Flexibility Program would not impact library services as resident generation would be similar to that of the Project. Therefore, with payment of requested mitigation fees, impacts related to the Design Flexibility Program would be less than significant.

3. CUMULATIVE IMPACTS

Implementation of the Project in combination with the 92 related projects identified in Section III (Environmental Setting), would be expected to further increase demand for library services in the Project vicinity. However, as previously stated, based on estimated library service area population, the Central Library does meet the proposed new branch building size criteria. With the implementation of LAPL recommended per capita mitigation fees, project impacts to library facilities would be less than significant and, thus, would not significantly contribute to cumulative impacts generated by the related projects.
4. PROJECT DESIGN FEATURES AND MITIGATION MEASURES

No project design features related to library facilities are proposed. No significant impacts related to library facilities have been identified, and no mitigation measures are required.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts on library facilities would be less than significant.