

III.J. PUBLIC SERVICES

The purpose of this section is to assess the impacts of the proposed project on fire protection, police services, schools, parks, and libraries. This section is based on comparisons of projected service needs to the existing or anticipated levels of service. It also utilizes information contained within the *Traffic Impact Analysis for Mixed-Use Project*, January 2014 (see **Appendix H**) and *Sewer and Water Infrastructure, 2014* (see **Appendix I**), *Water Supply Assessment, Department of Water & Power, 2014* (see **Appendix J**), and other information from the City of Los Angeles and Los Angeles Unified School District.

For each of the public services included in this section, facilities serving the project site and levels of service are described, as well as any improvements required to accommodate the project demand for additional public services. This section discusses current levels of service or capacity, as appropriate, and assesses the quantities of services necessary for construction and operation of the project. Services for the proposed project are assessed in terms of location, existing and projected service ratios, response times, and other service objectives as applicable. Cumulative impacts are determined with consideration of projected development in the study area.

EXISTING CONDITIONS

Figure III.J-1 shows existing fire stations, police stations, schools and libraries in the vicinity of the project site.

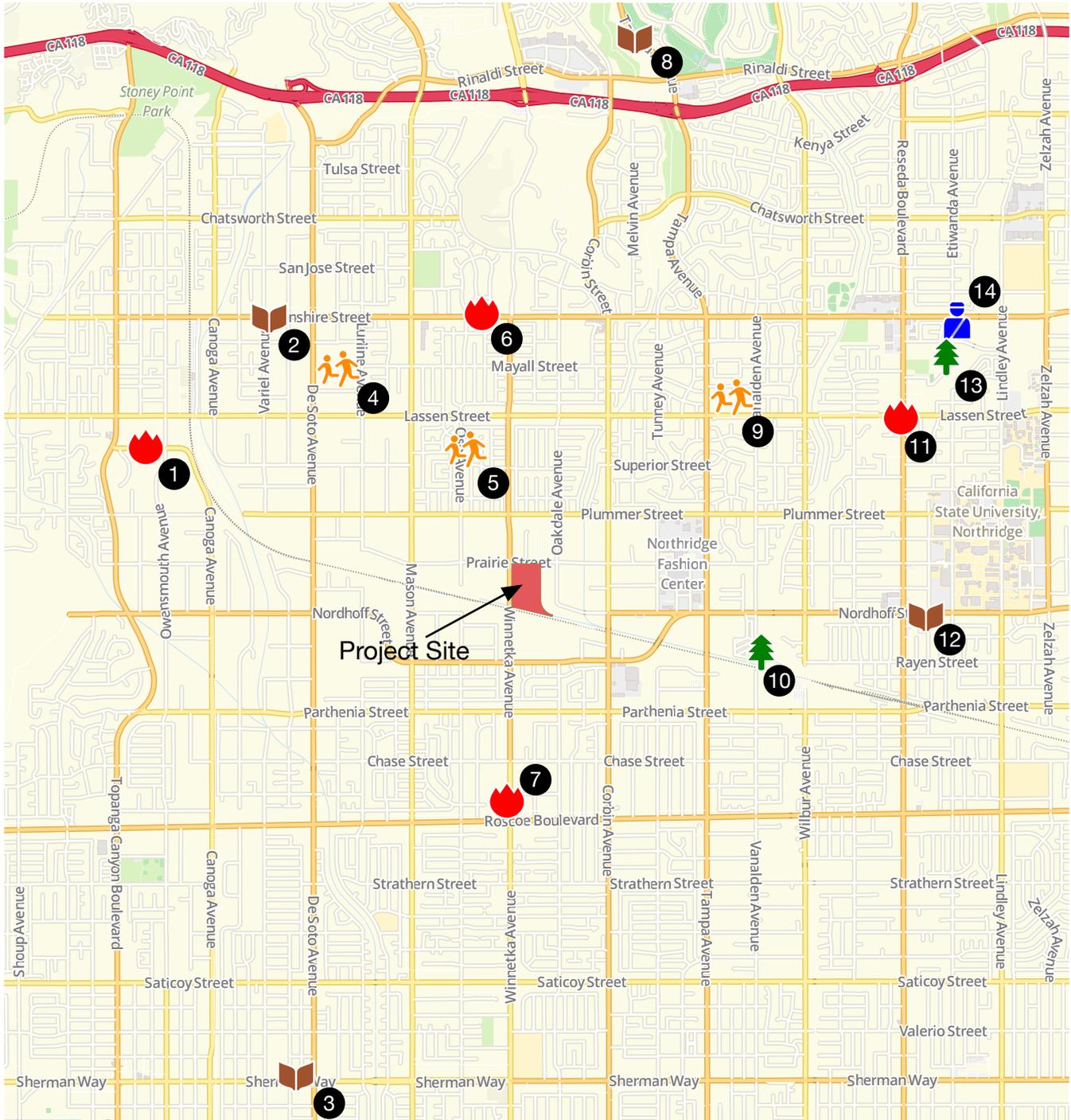
FIRE PROTECTION

Upgraded information systems have expanded the ability of City departments to assess service and infrastructure needs, as well as track the provision of services and infrastructure. Computer technology enables City departments to consider a variety of factors in assessing the need for services and infrastructure. Under the Los Angeles Fire Department (LAFD) Deployment Plan the service delivery area of each fire station is drawn so that fire apparatus can reach any address in that district within a specified response time. By analyzing data from previous years and continuously monitoring current data regarding response times, types of incidents and call frequencies, LAFD can shift resources to meet local demands for fire protection, as needed.

LAFD “first in” districts, or fire service areas, are based on response distances and times between the City’s neighborhood fire stations. “First in” district boundaries are generally located at half-way points between two stations. “First in” districts are also based on the land use contained within the district, since the demand for services and response times can vary depending on population density, traffic, building types, and uses. For example, an area crossed by high-traffic arteries or containing commercial districts or high-density residential uses may create greater demand on fire services within a prescribed geographic area than would single-family residential uses.

“Second call” stations support the first in stations during emergency situations. In an emergency, third and fourth response fire protection and emergency services would be provided, as needed, by other fire stations in the LAFD system in the surrounding area.

1 mile



Fire Stations

- 1 Station 96
- 6 Station 107
- 7 Station 104
- 11 Station 70

Libraries

- 2 Chatsworth
- 3 Canoga Park
- 8 Porter Ranch
- 12 Northridge

Parks (> 10 ac)

- 10 Vanalden Park
 - 13 Northridge Rec Center
- Police**
- 14 Devonshire Station

Schools

- 4 Superior St. Elementary
- 5 Alfred Bernhard Nobel Middle School
- 9 Chatsworth High School



SOURCE: Sirius Environmental, 2014

MGA Mixed-Use Campus Project ■

Figure III.J-1
Public Service Locations in Project Area

The LAFD classifies responses either as emergency medical service (EMS) or fire-related. EMS responses are further classified into either Basic Life Support (BLS) or Advanced Life Support (ALS). BLS medical responses require the deployment of a fire truck, an ambulance, and the services of an emergency medical technician (EMT). ALS medical responses require the deployment of a fire truck, an ambulance, and a paramedic. Fire-related responses include building fires, smoke, traffic accidents not requiring EMS, trash and vehicle fires, responses to fire alarms, elevator rescues, and similar emergencies.

The LAFD provides emergency medical service (EMS) and fire protection service to the project site. Fire Stations 104, 107, 70, and 96, are located closest to the project site and would provide emergency and fire services. **Table III.J-1** shows the location of fire stations serving the project site and relevant information including response time, distance to project, average response time, staffing/equipment, and existing roadways currently operating at Level of Service E and/or F.

TABLE III.J-1 SUMMARY OF FIRE STATIONS SERVING THE PROJECT SITE				
Fire Station (FS)	Distance to Project (miles)	Average Response Time (minutes)	Staffing/Equipment	Existing Roadways Operating at Level of Service E and/or F*
FS - 104 8349 Winnetka Avenue	1.3	5:03	6 firefighters 1 Engine and Advance Life Support (ALS) ambulance	None
FS - 107 20225 Devonshire Avenue	1.5	5:03	6 firefighters 1 Engine and ALS ambulance	None
FS - 70 9861 Reseda Boulevard	2.9	5:23	9 firefighters 1 Engine, ALS, Chief, and Emergency Medical Services (EMS) Supervisor	None
FS - 96 21800 Marilla Street	2.9	5:35	7 firefighters Light Force (aerial truck and one engine or pump) and ALS	None
*Note: All existing study area roadway intersection currently operate at LOS A, B, or C during peak hours (see Table 4: Existing Traffic Conditions Summary, Appendix H, (<i>Traffic Impact Analysis for Mixed-Use Project</i> , Overland Traffic Consultants, Inc. January 2014)). SOURCE: E-mail correspondence, Luke A. Milick, Captain I, Commander, Los Angeles Fire Department, May 12, 2014				

The LAFD indicates that commercial/industrial uses, should be located within 1 mile of an engine and within 1.5 miles of a truck. As shown in **Table III.J-1**, the project site is 1.3 miles from the closest engine station and 2.9 miles from the closest truck station.

Fire Hazards and Access Constraints

The project site is located in an urbanized area and is not within an area subject to brush fire hazards. The street widths easily accommodate fire trucks -- Winnetka Avenue adjacent to the project site is approximately 90 feet (curb to curb), while the width along Prairie Street is approximately 40 feet. None of the roadway grades for these streets exceed 15 percent or contain dead-ends exceeding 700 feet. As noted above in **Table III.J-1**, there are no existing study area intersection roadways currently operating at LOS E and/or F. In addition, current on-site uses do not currently involve manufacturing or storage of toxic, readily combustible or otherwise hazardous materials (as the site is vacant except for occasional showroom use).

On- and Off-Site Fire Suppression Facilities and Service Requirements

Table III.J.2 shows LAFD required fire flow by land use type. The project site was formerly occupied by an industrial use and therefore, was required to have a fire flow of 6,000 to 9,000 gallons per minute (GPM) from four to six fire hydrants flowing simultaneously. There are a total of five off-site fire hydrants serving the project site and a total of seven on-site fire hydrants serving the project site, including a pump station. A large (approximately 250,000 gallons) underground water storage tank is also located on the project site for use in the event of a fire. The off-site fire hydrants are capable of providing 1,500 GPM and are currently able to meet required fire flow requirements. The seven on-site fire hydrants are also capable of providing 1,500 GPM and are currently able to meet required fire flow requirements. There are currently no known off- or on-site fire hydrant deficiencies associated with the study area or project site.

TABLE III.J.2 FIRE FLOW BY TYPE OF LAND DEVELOPMENT	
Type of Land Development	Fire-Flow in Gallons Per Minute
Low Density Residential	2,000 GPM from three adjacent fire hydrants flowing simultaneously
High Density Residential and Neighborhood Commercial	4,000 GPM from four adjacent fire hydrants flowing simultaneously
Industrial and Commercial	6,000 TO 9,000 GPM from four to six fire hydrants flowing simultaneously
High Density Industrial and Commercial (Principal Business Districts or Centers)	12,000 GPM available to any block (where local conditions indicate that consideration must be given to simultaneous fires, and additional 2,000 to 8,000 GPM will be required).
Source: Source: Los Angeles Fire Code, Division 9, Access, Hydrants, and Fire Flow Requirements, Section 57.09.01. (http://lafd.org/prevention/hydrants/division_9_fc.html , accessed June 20, 2014).	

Table III.J.3 shows LAFD required fire hydrant spacing and type by land use development. As noted below, based upon these criteria, the proposed project currently requires a total of 12.85 double fire hydrants serving the site.¹ At present, there are a total of 12 fire hydrants (five off-site and seven on-site) serving the project site.² Therefore, the project site does not provide adequate fire hydrant spacing and type, based upon the site's current land use type. There are currently no known off- or on-site fire hydrant spacing or type deficiencies associated with the project area or project site.

¹ 1,028,016 square feet (23.6 project site) divided by 80,000 square feet (derived from Table III.J-2) equal to 12.85 fire hydrants required to serve the existing site.

² *Sewer & Water Infrastructure Summary Introduction*, 2014, Hall & Foreman, Inc. (see Appendix I, Existing Water Mains Exhibit).

TABLE III.J-3 FIRE HYDRANT SPACING AND TYPE OF HYDRANT BY TYPE OF LAND DEVELOPMENT			
Type of Land Development	Net Land Area Served Per Hydrant	Distance Between Hydrants on Roads and Fire Lanes	Type of Hydrant
Low Density Residential	*150,000 Sq. Ft.	600 Ft.	2 1/2" x 4" Double Fire Hydrant
High Density Residential & Neighborhood Commercial	*100,000 Sq. Ft.	300-450 Ft.	2 1/2" x 4" Double Fire Hydrant (Amended by Ord. No. 169,944 Eff. 8/20/94).
Industrial & Commercial	*80,000 Sq. Ft.	300 Ft.	2 1/2" x 4" Double Fire Hydrant or 4" x 4" Double Fire Hydrant
High Density Industrial & Commercial	*40,000 Sq. Ft.	300 Ft.	4" x 4" Double Fire Hydrant
*Note: This figure will be systematically reduced where greater fire- flow is required due to restricted access, depth of lots, length of blocks, or additional hazards. SOURCE: Los Angeles Fire Code, Division 9, Access, Hydrants, and Fire Flow Requirements, Section 57.09.01. (http://lafd.org/prevention/hydrants/division_9_fc.html , accessed June 20, 2014).			

POLICE PROTECTION

The LAPD provides police services for the City of Los Angeles. The proposed project is located in the Devonshire Area, Reporting District (RD 1772). The Devonshire Area Station is one of seven stations under the jurisdiction of the Valley Bureau. The Devonshire Area Station is located at 10250 Etiwanda Avenue, approximately 2.5 miles northeast of the project site. The communities included in the service boundaries for the Devonshire Station span approximately 48 square miles and include the communities of Chatsworth and Northridge, as well as parts of Canoga Park, Granada Hills and Winnetka. The estimated station service population is 216,504 people.³

According to the LAPD, the average response time to emergency calls in the Devonshire area during 2013 was 7.4 minutes, which is above to the Citywide average response time that was 5.9 minutes during 2013 and the seven minute response time that is the set standard.⁴ According to the LAPD, there are approximately 243 sworn officers and 12 civilian support staff deployed within the Devonshire Area.⁵ In 2013 there were 39 crimes per 1,000 in the Devonshire Area as compared to a citywide average of 50 crimes per 1,000. Based on the approximate population of the Devonshire Area of 219,136 persons, there is one sworn police officer for approximately every 891 persons.

Police deployment is based on a number of factors and cannot be precisely calculated on police-need-per-population standards. LAPD uses a computer model called Patrol Plan that considers 25 different variables, such as forecast call rate, average service time, etc, and to target personnel where and when they are most needed. Using Patrol Plan, LAPD has succeeded in reducing crime for nine years in a row. Police services are addressed Citywide, the anticipated population in 2035 in the Devonshire Community Police Station area is consistent with Citywide projections used by LAPD for planning purposes.

³ Los Angeles Police Department: http://www.lapdonline.org/devonshire_community_police_station/content_basic_view/1589, accessed June 22, 2014.

⁴ Andrew J. Smith, Commander, Commanding Officer, Media Relations and Community Affairs Group, Los Angeles Police Department

⁵ Ibid

SCHOOLS

The Los Angeles Unified School District (LAUSD) administers the public school system of the City of Los Angeles and some neighboring communities. The LAUSD serves over 600,000 students and administers over 891 schools.⁶ LAUSD is currently engaged in the largest school construction building program in its history. The primary goal of new construction is to provide every student the opportunity to attend a two-semester neighborhood school. According to LAUSD, achieving this goal allows results in better education through the design, construction and maintenance of healthy, safe and modern facilities that promote schools as centers of community. There are currently no new construction projects planned for schools serving the project site.⁷

No students are currently generated from the industrially zoned site. The schools that would serve the proposed project are Superior Elementary School, Nobel Middle School, and Chatsworth Charter High School. All three schools were operating below capacity during the 2013-14 school year. A summary of the enrollment capacities and school capacities for the three schools are provided in **Table III.J-4**.

School	Location	School Capacity	2013-2014 Enrollment	Over-crowded?
Superior Elementary School	9756 Oso Ave, Chatsworth	609	602	No
Nobel Middle School	9950 Tampa Ave, Northridge	2,664	2,562	No
Chatsworth Charter High School	10027 Lurline Ave, Chatsworth	3,134	2,356	No

Source: Los Angeles Unified School District, Rena Perez, Master Planning and Demographics, May 28, 2014.

PARKS

The City of Los Angeles has approximately 15,700 acres of parkland that are administered by the City's Department of Recreation and Parks.⁸ According to the City of Los Angeles Public Recreation Plan, parks can be classified into three groups: neighborhood, community, and regional. A neighborhood park should be a minimum of five acres in size (ideally 10 acres) with a service radius of one-half mile. Vest Pocket Parks, which are less than five acres, are also considered neighborhood parks. A community park should be a minimum of 10 to 15 acres in size (ideally 20 acres), with a service radius of two miles.⁹ Regional parks are generally over 50 acres in size and serve the entire city region. The City of Los Angeles, in comparison with other large metropolitan areas in the United States, has less parkland per number of residents.

⁶ <http://www.teachinla.com/whyteach/about.html>. Accessed June 22, 2014.

⁷ <http://mo.laschools.org/fis/nc/> and <http://www.laschools.org/new-site/my-school/modernization-search>. Accessed June 30, 2014.

⁸ <http://www.laparks.org/dos/dept/who.html>. Accessed June 22, 2014.

⁹ http://cityplanning.lacity.org/Code_Studies/GeneralElement/PublicRecreationPlan.pdf and letter received from Michael A. Shull, General manager, Ramon Barajas, Assistant General Manager, Recreation and Parks Department, May 9, 2014.

There are two City of Los Angeles neighborhood and community parks located in the applicable service radius surrounding the site. The Northridge Recreation Center is located at 18300 Lemarsh Street and is approximately 2.25 miles to the northeast of the project site. Vanalden Park is located at 8956 N. Vanalden Avenue and is approximately 1.5 miles southeast of the project site. **Table III.J-5** includes the parks that are located in close proximity to the project site.

The Department of Recreation and Parks does not have current plans for construction or expansion of parks and recreational facilities within a two-mile radius of the project site.¹⁰

Park	Location	Distance from Site	Area	Facilities
Northridge Recreation Center	18300 Lemarsh Street	2.25 miles	24.02 acres	Auditorium, barbecue pits, baseball diamond (lighted), basketball courts (lighted/indoor), basketball courts (lighted/outdoor), childrens play area, community room, indoor gym (without weights), picnic tables, seasonal pool (outdoor/heated), soccer field (lighted), tennis courts (lighted).
Vanalden Park	8956 N. Vanalden Avenue	1.5 miles	10.89 acres	Picnic tables, horseshoe pit, jogging path.

Source: City of Los Angeles Department of Recreation and Parks, 2014.

LIBRARIES

The Los Angeles Public Library (LAPL) manages the library system of the City of Los Angeles. The system includes the Central Library, located in Downtown Los Angeles, and 72 branch libraries located throughout the City.¹¹ The LAPL offers a multitude of programs for residents of all ages including films, children's programs, reading clubs, book discussions and reviews, and Internet classes. The library system maintains a collection of over six million books, periodicals, government documents, and audio-visual materials. LAPL branches typically have a service radius of two-miles, with the exception of the main library that serves a much larger area. **Table III.J-6** contains information on libraries serving the project area.

¹⁰ City of Los Angeles Department of Recreation and Parks, Ramon Barajas, General Manager, May 9, 2014.

¹¹ Los Angeles Public Library, 2014, <http://www.lapl.org>, accessed online June 22, 2014.

TABLE III.J-6 CITY OF LOS ANGELES LIBRARIES IN PROJECT AREA						
Library	Location	Approximate Distance from Site	Service Area Boundary	Residents Served	Branch Size (square feet)	Staff/Materials
Chatsworth Branch Library	21052 Devonshire Street	3.0 miles	5 miles	52,903	12,500	9.5 full time employees 53,745 volumes 24 computers
Canoga Park Branch Library	20939 Sherman Way	2.8 miles	5 miles	79,747	12,500	9.0 full time employees 63,529 volumes 20 computers
Northridge Branch Library	9051 Darby Avenue	2.0 miles	5 miles	66,761	12,500	7.5 full time employees 59,519 volumes 22 computers
Porter Ranch Branch Library	11371 Tampa Avenue	2.5 miles	5 miles	35,382	12,300	7.0 full time employees 58,469 volumes 10 computers

SOURCE: City of Los Angeles Public Library, 2014

REGULATORY FRAMEWORK

Fire

State

California Building Code. The California Building Code (CBC) [California Code of Regulations (CCR), Title 24] is a compilation of building standards, including fire safety standards for new buildings. CBC standards are based on building standards that have been adopted by state agencies without change from a national model code; building standards based on a national model code that have been changed to address particular California conditions; and building standards authorized by the California legislature but not covered by the national model code. The CBC includes the California Fire Code (CFC) [CCR, Title 24, Part 9]. Typical fire safety requirements of the CFC include the installation of fire sprinklers in all high-rise buildings, the establishment of fire resistance standards for fire doors, building materials, and particular types of construction, and the clearance of debris and vegetation within a prescribed distance from occupied structures within wildfire hazard areas. The CBC applies to all occupancies in California, except where stricter standards have been adopted by local agencies. The State adopted the 2007 CBC in July 2007, which became effective on January 1, 2008. Specific CBC building and fire safety regulations have been incorporated by reference in the Los Angeles Municipal Code (LAMC) with local amendments.

City

City of Los Angeles General Plan Framework. The City of Los Angeles General Plan Framework Element (Framework), adopted in December 1996 and readopted in August 2001, provides a comprehensive, long-range strategy for accommodating long-term growth in the City and defines Citywide policies regarding issues including infrastructure and public services. The Infrastructure and Public Services Chapter of the Framework sets forth goals, objectives, and

policies for fire protection and EMS in the City. Objectives and policies of Goal 9J of the Infrastructure and Public Services Chapter ensure that every neighborhood has the necessary level of fire protection service, EMS, and infrastructure. Specifically, Objective 9.16 states “monitor and forecast demand for existing and projected fire facilities and service”. Objective 9.17 “assures that all areas of the City have the highest level of fire protection and EMS, at the lowest possible cost, to meet existing and future demand. Objective 9.18 is “phase the development of new fire facilities with growth” while Objective 9.19 strives to “maintain the Los Angeles Fire Department’s ability to assure public safety in emergency situations.” Under the Framework, the City standard for response distance from the fire station to the destination location is 1.5 miles.¹²

In general, the required fire flow for a project is closely related to land use because 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 and building age or type of construction). Fire flow requirements, which are established in Section 57.09.06 of the Fire Code, vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any instance, a minimum residual water pressure of 20 pounds per square inch (psi) is to remain in the water system while the required gpm is flowing.

City of Los Angeles General Plan Safety Element. The General Plan Safety Element (Safety Element), which was adopted November 26, 1996, contains policies related to the City’s response to hazards and natural disasters such as fires. The goals, policies, and programs of the Safety Element are broadly stated to reflect the comprehensive scope of the Emergency Operations Organization (EOO), of which the LAFD is a member. Policy 2.1.6 of the Safety Element calls for the City to continue to maintain, enforce, and upgrade requirements, procedures, and standards to facilitate effective fire suppression. Fire suppression standards include peak load water flow and Building and Fire Code regulations, including minimum road widths, access, and clearances around structures. The policy further states that the LAFD shall revise regulations or procedures to include the establishment of minimum standards for the location and expansion of fire facilities based on fire flow, intensity and type of land use, life hazard, occupancy, and degree of hazard so as to provide adequate fire and EMS response.

City of Los Angeles Municipal Code. All new construction must comply with the applicable provisions as set forth in the Los Angeles Municipal Code (LAMC). In the Fire Protection and Prevention Chapter of the LAMC, Article 7 (Fire Code), the LAFD’s Bureau of Fire Prevention and Public Safety is required to administer and enforce basic building regulations set by the State Fire Marshal. The LAMC also contains, by reference, the CBC which includes the CFC with local amendments. The local Fire Code contained within the LAMC also reflects the policies of the General Plan Safety Element. The Fire Code sets forth regulatory requirements pertaining to the prevention of fires, the investigation of fires or life safety hazards, the elimination of fire and life safety hazards in any building or structure including buildings under construction, the maintenance of fire protection equipment and systems, and the regulation of the storage, use, and handling of hazardous materials.¹³

¹² City of Los Angeles General Plan Framework, page 9-5.

¹³ City of Los Angeles Municipal Code, Article 7, Chapter V, Section 57.01.02, amended in Entirety, Ordinance Number 162,123, effective May 12, 1987.

Response distance relates to the linear travel distance (i.e., miles between a station and a project site). The Los Angeles Fire Code specifies the maximum response distances allowed between specific sites and engine and truck companies based on land use and fire flow requirements. Pursuant to Section 57.09.07 of the LAMC, the maximum response distance between residential land uses and a LAFD fire station that houses an Engine or Truck Company is 1.5 miles. When response distances exceed these recommendations, all new structures must be equipped with automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems, etc.).

Division 118 of the Fire Code classifies buildings where the highest floor level is more than 75 feet above the lowest point of fire access as high-rises. Buildings classified as high-rise are subject to specific requirements for fire safety, including the provision of a rooftop helipad.

City of Los Angeles Propositions F and Q. The City of Los Angeles Fire Facilities Bond (Proposition F), approved by voters in November 2000, allocates \$378.6 million of funds to build 19 new or replacement fire/paramedic facilities. Proposition Q, the Citywide Public Safety Bond Measure, approved by voters in March 2002, allocated \$600 million to renovate, improve, expand and construct police, fire, 911, and paramedic facilities. Proposition Q involves 13 overall projects consisting of the construction and/or replacement of five new police stations, one new police station and jail, two bomb squad facilities, one Metro Detention Center, one new Emergency Operations/Dispatch Center, one Valley Traffic Division and Bureau Headquarters, renovation of existing fire facilities, and renovation of police facilities. Proposition Q provides funding for minor construction improvements (e.g., installation of HVAC systems, driveway resurfacing) for Fire Stations No. 72 and No. 105.

Police

City

Los Angeles General Plan Framework. Goal 9I of the Infrastructure and Public Services Chapter of the Citywide General Plan Framework states that every neighborhood has the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.¹⁴ Objective 9.13 and Policy 9.13.1 requires the monitoring and reporting of police statistics and population projections for the purpose of evaluating existing and future needs. Objective 9.14 requires that adequate police services, facilities, equipment, and personnel are available to meet existing and future public needs. Additionally, Objective 9.15 requires police services to provide adequate public safety in emergency situations by maintaining mutual assistance relationships with local law enforcement agencies, State law enforcement agencies, and the National Guard. Presently, the LAPD Computer Statistics Unit (COMPSTAT) implements the General Plan Framework goal of assembling statistical population and crime data to determine necessary crime prevention actions. This system implements a multilayer approach to police protection services through statistical and geographical information system (GIS) analysis of growing trends in crime through its specialized crime control model. As such, COMPSTAT has effectively and significantly reduced

¹⁴ City of Los Angeles General Plan Framework, page 9-5.

the occurrence of crime in Los Angeles communities through accurate and timely intelligence regarding emerging crime trends or patterns.¹⁵

City of Los Angeles Charter, Administrative, and Municipal Codes. The law enforcement regulations and the powers and duties of the LAPD are outlined in the City of Los Angeles Charter Article V, Section 570; the City of Los Angeles Administrative Code Chapter 11, Section 22.240; and the Los Angeles Municipal Code (LAMC) Chapter 5 (Public Safety and Protection), Article 2 (Police and Special Officers). Pursuant to the City Charter, the Board of Police Commissioners is the head of the Police Department. The Board sets overall policy while the Chief of Police manages the daily operations of the Department and implements the Board's policies or policy direction and goals.

City of Los Angeles Charter Article V, Section 570 gives power and duty to the LAPD to enforce the penal provisions of the Charter, City ordinances and State and Federal law. The Charter also gives responsibility to the LAPD to act as peace officers and to protect lives and property in case of disaster or public calamity. Section 22.240 of the Los Angeles Administrative Code requires the LAPD to adhere to the State of California standards described in Section 13522 of the California Penal Code, which charges the LAPD with the responsibility of enforcing all LAMC Chapter 5 regulations related to fire arms, illegal hazardous waste disposal, and nuisances, such as excessive noise, and providing support to the Department of Building and Safety Code Enforcement inspectors and the Fire Department in the enforcement of the City's Fire, Building, and Health Codes. The LAPD is given the power and the duty to protect residents and property, and to review and enforce specific security related mitigation measures in regards to new development. Furthermore, as stated under the Los Angeles Administrative Code, the LAPD is also given the duty and power to protect the lives and properties of the community in the case of a disaster or public calamity.

Schools

State

California Government Code Section 65995. California Government Code Section 65995 is found in Title 7, Chapter 4.9 of the California Government Code. California Government Code Section 65995 authorizes school districts to collect impact fees from developers of new residential and commercial/industrial building space. Senate Bill 50 (SB 50) amended Government Code Section 65995 in 1998. Under the provisions of SB 50 schools can collect fees to offset costs associated with increasing school capacity as a result of development. The development associated with the proposed project would be subject to applicable fees determined by the LAUSD per California Government Code Section 65995. The LAUSD determines the fees in accordance with California Government Code Section 65995, annually, and publishes them in their school fee justification study.

California Education Code. The LAUSD facilities and services are subject to the rules and regulations of the California Education Code and governance of the State Board of Education (SBE). The SBE is the 11-member governing and policy-making body of the California Department of Education (CDE) that sets K-12 education policy in the areas of standards, instructional materials, assessment, and accountability. The CDE and the State Superintendent

¹⁵ LAPD. "COMPSTAT." http://www.lapdonline.org/search_results/content_basic_view/6363. Accessed June 24, 2014.

of Public Instruction are responsible for enforcing education law and regulations; and for continuing to reform and improve public elementary school, secondary school, and child care programs, as well as adult education and some preschool programs. The CDE's mission is to provide leadership, assistance, oversight, and resources so that every Californian has access to an education that meets world-class standards.¹⁶ The core purpose of the CDE is to lead and support the continuous improvement of student achievement, with a specific focus on closing achievement gaps.¹⁷

Leroy F. Green School Facilities Act of 1998 (Senate Bill (SB) 50). Senate Bill (SB) 50, the Leroy F. Greene School Facilities Act of 1998, was signed into law on August 27, 1998. It placed a \$9.2 billion State bond measure (Proposition 1A), which included grants for modernization of existing schools and construction of new schools, on the ballot at the November 3, 1998 election. Proposition 1A was approved by voters, thereby enabling SB 50 to become fully operative. Under SB 50, a program for funding school facilities largely based on matching funds was created. Its construction grant provides funding on a 50/50 State and local match basis, while its modernization grant provides funding on a 60/40 basis. Districts that are unable to provide some, or all, of the local match requirement and are able to meet the financial hardship provisions may be eligible for additional State funding.¹⁸

In addition, SB 50 allows governing boards of school districts to establish fees to offset costs associated with school facilities made necessary by new construction. Pursuant to SB 50, the LAUSD collects development fees for new construction within its district boundaries. Payment of these fees is required prior to issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities from implementation of a project to less than significant levels.

City

City of Los Angeles General Plan. The City of Los Angeles General Plan provides growth and development policies by providing a comprehensive long-range view of the City as a whole. The General Plan provides a comprehensive strategy for accommodating long-term growth. Goals and policies that apply to all development within the City of Los Angeles include a balanced distribution of land uses, adequate housing for all income levels, and economic stability. These planning documents together with regional projections provided by the Southern California Association of Governments (SCAG) provide data so that LAUSD can match school planning with land use planning in the City.

While the City has a Public Facilities and Services Element identifying public service facilities, including schools, it is now somewhat dated.

¹⁶ California Department of Education, Role and Responsibilities, accessed online at: <http://www.cde.ca.gov/eo/mn/rr/>, accessed June 24, 2014.

¹⁷ California Department of Education, Belief and Purpose, accessed online at: <http://www.cde.ca.gov/eo/mn/mv/>, accessed June 24, 2014.

¹⁸ State of California, Office of Public School Construction, School Facility Program Handbook, February 2006.

Parks

State

Quimby Act. Section 66477 of the California Government Code, also known as the Quimby Act, was enacted in an effort to promote the availability of park and open space areas in response to California's rapid urbanization and decrease in the number of parks and recreational facilities. Under the Quimby Act, requirements for dedications of land are not to exceed five acres of parkland per 1,000 persons residing within a subdivision, and in-lieu fee payments shall not exceed the proportionate amount necessary to provide three acres of parkland, unless the amount of existing neighborhood and community parkland exceeds that limit. If the parkland standard is not exceeded in a project area, cities may request a minimum exaction for the proposed project under the Quimby Act of three acres of parkland per 1,000 persons, and up to five acres per 1,000 if that city currently has five acres of parkland per thousand residences. The City of Los Angeles relies on four acres per 1,000 persons standard. The Quimby Act also authorizes cities and counties to enact ordinances requiring the dedication of land, or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative map or parcel map. Thus, Los Angeles Municipal Code (LAMC) Section 17.12 was authorized pursuant to the Quimby Act. Compliance with the Quimby Act as set forth in Section 17.12 of the LAMC is discussed below.

City

City of Los Angeles General Plan. The City of Los Angeles General Plan indicates that a park and recreation system should address standards in the following three areas: (1) sufficient land area reserved for parks and recreation; (2) appropriate distribution of park and recreation facilities throughout the City; and (3) a full complement of park and recreation facility types (i.e., active and passive recreation for all age groups) to accommodate a wide variety of users. Facilities should be provided at the neighborhood, community, and regional levels.

Within the City's General Plan, the Public Recreation Plan (PRP) establishes policies and standards related to parks, recreation facilities, and open space areas in the City. The PRP provides Citywide goals, objectives, and recommendations concerning parks and recreation facilities. In addition to the standards established in the PRP, park and open space requirements pursuant are also set forth in Sections 12.21 and 17.12 of the LAMC. The following provides information regarding both the PRP and applicable LAMC standards and requirements.

Public Recreation Plan. Adopted in 1980 by the Los Angeles City Council, the PRP focuses on the development of physical facilities by emphasizing the provision of neighborhood and community recreation sites, including community buildings, gymnasiums, swimming pools, and tennis courts.¹⁹ To a larger extent, the PRP focuses on facility planning in residential areas, as these areas generate the greatest demand for parks and recreational facilities. The PRP also establishes general locations for future facilities based on a proposed service radii and projected population levels.

¹⁹ City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan. Approved October 9, 1980.

According to the standard park characteristics identified in the PRP, park facilities are discussed in terms of local parks and regional facilities. Local parks include neighborhood and community recreation sites, open space, and “small” parks, which are usually characterized as less than one acre in size. A neighborhood park typically provides space and facilities for outdoor and indoor recreation activities intended to serve residents of all ages within the immediate neighborhood. Neighborhood parks typically include a recreation building, multi-purpose field, hard court area, play apparatus, picnic area, off-street parking, and a maintenance area. Although the ideal size for a neighborhood park is considered to be 10 acres, such parks within the City of Los Angeles are typically one to five acres in size. Community parks (considered regional facilities) are designed to serve residents of all ages in several surrounding neighborhoods and includes such facilities as a community building, multi-purpose fields, hard court areas, parking, maintenance service areas, and play areas. These facilities may also include baseball diamonds, football and soccer fields, tennis and handball courts, and a swimming pool. According to the PRP, the ideal size for a community park is considered to be 15 to 20 acres.

The PRP also states that the location and allocation of acreage for a neighborhood and community park and recreational facilities should be determined on the basis of the service radius within residential areas throughout the City. The desired long-range standard for local parks is based on a minimum of two acres per 1,000 persons for neighborhood parks with a service radius of 0.5 mile, plus a minimum two acres per 1,000 persons for community parks with a service radius of two miles (for a total of four acres).²⁰ However, the PRP also notes that these long-range standards may not be reached during the life of the plan, and therefore, includes more attainable short- and intermediate-range standards of one acre per 1,000 persons within a one-mile service radius for neighborhood parks and one acre per 1,000 persons within a two mile service radius for community parks. The PRP also establishes that no park or recreational facility shall be diminished in size or removed from any service radius unless the required acreage is replaced elsewhere within that same service radius, or the need for parks or recreational facilities is diminished due to population and/or land use changes.

City of Los Angeles Community Needs Assessment. The Department of Recreation and Parks (DRP) has completed a number of planning documents that address the need for parks and recreational facilities within the City of Los Angeles. The most recent document completed by DRP is a Citywide Community Needs Assessment. The Assessment examined current and future recreational needs in the City as a first step in developing a Citywide park master plan and a five year capital improvement plan. The overall objectives of the Assessment were to address needs for additional recreation facilities and park land, identify improvements to facilities to meet current and future demands, prevent future maintenance issues, and offer positive alternatives to an increasingly dense and urbanized population.²¹ The Assessment provides a number of key recommendations to be implemented through a detailed master planning process. These recommendations include, but are not limited to, working with the City’s Planning Department to modify Section 17.12 of the LAMC and update the PRP, developing an updated pricing and revenue plan to offset capital and operational costs, and

²⁰ http://cityplanning.lacity.org/Code_Studies/GeneralElement/PublicRecreationPlan.pdf and letter from Michael A. Shull, General Manager, Ramon Barajas, Assistant General Manager, Recreation and Parks Department, May 9, 2014.

²¹ LA DRP, Citywide Community Needs Assessment, online at: <http://losangeles.prosconsulting.com/index.html>, accessed June 24, 2014.

implementing a land acquisition strategy involving developer impact agreements based on the standards for open space desired.²²

Based on the Assessment, the expectation as to how far people are willing to travel to parks and recreational facilities has changed drastically since the time that the PRP was adopted in 1980. Specifically, 63% of survey respondents for the Assessment stated that they would travel at least one mile to visit a neighborhood park and 38% of respondents would travel at least two miles. Additionally 71% of respondents would travel at least two miles to visit a community park and 37% would travel more than three miles to visit a community park. The Assessment also made the following findings:

- The City lacks the appropriate levels of neighborhood and community parks that are close to home and parks are not equitably distributed.
- The amount of parkland available in the City is low for the level of density in the City and people would like more land for mini-parks, neighborhood parks, community parks and downtown parks. More parks are needed in redevelopment areas.
- There is a concern that some parks are unsafe and controlled by gangs and lack significant security, keeping people from using the park in a productive manner.
- Parks are in need of infrastructure improvements to restrooms, parking areas, playgrounds, picnic facilities, sports courts, security lighting, irrigation systems, and sports fields. Poor general site conditions encourage vandalism and keep the community from using the parks in a positive manner.
- Sports fields are a needed amenity.
- Sustainable landscapes in parks are an important design element that the DRP should incorporate into design standards.
- Some existing parks are outdated in design. The DRP needs to develop new design standards for parks in the future and customize the parks to the people living in the area that will be using the park.
- Walkability of the City and the ability to walk in City parks are important.
- The DRP must create a balance of park types and manage by park and amenity standards that promote equal access.
- Many citizens indicate that parks were overused on weekends.

Los Angeles River improvements were brought forward as opportunity sites that could be developed and improved for parks and recreation purposes.

In addition, the City of Los Angeles General Plan indicates that the adequacy of the public park and recreation system is based on three general standards: (1) sufficient land area reserved for parks and recreation; (2) appropriate distribution of park and recreation facilities throughout the City; and (3) a full complement of park and recreation facility types (i.e., active and passive recreation for all age groups) to accommodate a wide variety of users. The General Plan further states that parks and recreational facilities should be provided at the neighborhood, community, and regional levels. The Public Recreation Plan (PRP), a component of the City's General Plan, establishes policies and standards related to parks, recreation facilities, and open space areas in the City. The PRP provides citywide goals, objectives, and recommendations concerning parks and recreation facilities. In addition to the City standards established in the PRP, park and

²² LA DRP, Final Report of the Citywide Community Needs Assessment, online at: http://www.laparks.org/assessment_blog.htm, accessed June 24, 2014.

open space requirements pursuant to the Quimby Act are also set forth in Sections 12.33 and 17.12 of the LAMC.

City of Los Angeles Municipal Code (LAMC). Section 12.21G of the LAMC requires that all residential developments containing six or more dwelling units on a lot provide, at a minimum, the following usable open space area per dwelling unit: 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. Section 12.21 of the LAMC also identifies what areas of a project would qualify as usable open space for the purposes of meeting the project's open space requirements. Usable open space is defined as areas designated for active or passive recreation and may consist of common and/or private areas. Common open space areas must be readily accessible to all residents of the site and constitute at least 50 percent of the total required usable open space. Common open space areas can incorporate recreational amenities such as swimming pools, spas, children's play areas, and sitting areas. A minimum of 25 percent of the common open space area must be planted with ground cover, shrubs, or trees. In addition, indoor recreation amenities cannot constitute more than 25 percent of the total required usable open space. Private open space is an area which is contiguous to and immediately accessible from an individual dwelling unit, may have a dimension no less than six feet in any direction and must contain a minimum of 50 square feet, of which no more than 50 square feet per dwelling unit can be counted towards the total required usable open space. Private open space may not have a dimension of less than six feet in any direction.

Section 17.12 of the LAMC, authorized under the Quimby Act (applicable to projects requesting a zone change or subdivision), which requires developers to set aside land for park and recreational purposes, donate conservation elements, and/or pay fees for park improvements, provides standards for parkland acreage requirements and identifies fees per unit. The area of land that is required to be dedicated for park and recreation uses is determined by the maximum density permitted by the zone within which the site is located. However, section 17.12 C of the LAMC provides an exception where an applicant proposes to develop land at less than the maximum density permitted for the zone,²³ the Advisory Agency shall base the required dedication upon the proposed density.

If a developer fails to meet the full dedication requirement, fees for park improvements may be paid to the Department of Recreation and Parks (DRP) in lieu of the dedication of all or a portion of the land. The in-lieu fees are calculated per dwelling unit to be constructed based on the proposed zoning of the project, less any applicable credits for on-site open space permitted by LAMC Section 17.12F.²⁴ (The LAMC allows the Advisory Agency to clarify the applicable fee based on the applicable residential density.)

Section 17.12 of the LAMC allows recreation areas developed within a project site for use by the particular project's residents to be credited against the project's land dedication or in lieu fee requirement. Recreational areas that qualify under this provision of Section 17.12 include, in part, swimming pools and spas (when the spas are an integral part of a pool complex) and children's play areas with playground equipment comparable in type and quality to those found

²³ This exception is granted where the subdivider has executed and recorded in the office of the County Recorder a covenant running with the land, that such land shall not be developed in such a manner as to create higher density than that proposed in the project.

²⁴ City of Los Angeles Department of City Planning, memo, February 19, 2013: <http://www.cityplanning.lacity.org/eforms/notices/quimbyfees.pdf>. Website accessed on June 22, 2014.

in City parks. Furthermore, the recreational areas proposed as part of a project must meet the following standards in order to be credited against the requirement for land dedication: (1) each facility is available for use by all of the residents of a project; and (2) the area and the facilities satisfy the park and recreation needs of a project so as to reduce that project's need for public park and recreation facilities. Section 17.12 provides that outdoor landscaped area may be credited against the project's land dedication or in lieu fee payment requirement if approved by the Advisory Agency.

Consistent with Section 17.12, Section 12.33 of the LAMC prohibits the rezoning of a property to permit a multiple residential use in any multiple residential or commercial zone unless a dedication of parkland has been made or assured or a payment in lieu thereof has been made or guaranteed. The parkland dedicated and/or the in-lieu payment are subject to the restrictions, conditions, exemptions and credits of Section 17.12. The parkland dedication or payment (after credit for on-site open space) must be made in accordance with the provisions of Section 17.12, and is based upon the maximum number of dwelling units permitted by the requested zone or upon the number of dwelling units which may be constructed.

ENVIRONMENTAL IMPACT

THRESHOLDS OF SIGNIFICANCE

The following thresholds of significance are based on the *City of Los Angeles' CEQA Thresholds Guidelines* (2006). They were developed to evaluate potential impacts on public services.

A proposed project would normally have a significant impact on public services if it:

Fire Services

- Results in substantial adverse physical impacts associated with fire protection facilities or a need for new or physically altered fire protection facilities in order to maintain acceptable service ratios or response times, or other performance objectives.

Police Protection

- Results in substantial adverse physical impacts associated with police protection facilities or a need for new or physically altered police protection facilities in order to maintain acceptable service ratios or response times, or other performance objectives.

Schools

- Results in substantial adverse physical impacts associated with public schools or need for new or physically altered public schools in order to maintain acceptable service ratios, or other performance objectives.

Recreation & Parks

- Consider the following: 1) scheduled improvements to recreation and park services (renovation, expansion, or addition); 2) the project's net population increase and the associated contribution to demand and 3) project features that would reduce demand for recreation and park service. Based on these factors, the proposed project would have a significant impact on recreation and park services if the project generates a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or financial support

METHODOLOGY

The assessment of impacts to public services was based on information and/or requirements contained in applicable state regulations and the *City of Los Angeles' CEQA Thresholds Guide*. These resources in addition to the thresholds of significance formed the basis for the impact assessment.

PROJECT IMPACTS

Fire Protection

In general, project impacts regarding fire services are evaluated by the LAFD on a project-by-project basis. A project's land use, fire-related needs, and whether the project site meets the recommended response distance and fire safety requirements as well as project design features which would reduce or increase the demand for fire protection services are taken into consideration. Beyond the standards set forth in the Los Angeles Fire Code, consideration is given to the project size and components, required fire-flow, response time, and response distance for engine and truck companies, fire hydrant sizing and placement standards, access, and potential to use or store hazardous materials. Further evaluation of impacts considers whether or not the development of the project would create the need for a new fire station or expansion, relocation, or consolidation of an existing facility to accommodate increased demand. Consultation with the LAFD is also conducted to determine the project's effect on fire protection and emergency medical services.

Construction

In general, project impacts regarding fire services are evaluated by the LAFD on a project-by-project basis. A project's land use, fire-related needs, and whether the project site meets the recommended response distance and fire safety requirements as well as project design features which would reduce or increase the demand for fire protection services are taken into consideration. Beyond the standards set forth in the Los Angeles Fire Code, consideration is given to the project size and components, required fire-flow, response time, and response distance for engine and truck companies, fire hydrant sizing and placement standards, access, and potential to use or store hazardous materials. Further evaluation of impacts considers whether or not the development of the project would create the need for a new fire station or expansion, relocation, or consolidation of an existing facility to accommodate increased demand. Consultation with the LAFD is also conducted to determine the project's effect on fire protection and emergency medical services.

Short-term construction activities such as lane closures, sidewalk closures, and utility line construction, could affect adjacent street right-of ways and thus, could have implications in relation to response times. Construction activities would also generate traffic associated with the movement of construction equipment, hauling of demolition and graded materials, and employee traffic. As such, construction activities could increase response times. However, the proposed project would be required to develop a construction staging and traffic management plan, wherein traffic management personnel (flag persons) would be employed as necessary to ensure emergency access is maintained, consistent with LAFD requirements.

Operation

The project site is currently occupied by a light industrial land use and associated surface parking. The LAFD already provides fire protection and emergency services for the project site. The proposed project would re-purpose the former project site and build a corporate and residential mixed-use development totaling 1,212,515 million square feet of floor area. The project would consist of three components: (1) adaptive re-use and rehabilitation of the existing industrial/office building, light industrial functions and new creative office space; (2) development of 700 rental housing units in four main residential buildings with extensive shared recreational campus amenities; and (3) 14,000 square feet of retail/restaurant uses at the corner of Winnetka Avenue and Prairie Street. The additional residents, employees and patrons would increase demand for fire protection and emergency services.

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

Appendix I contains the Fire Flow analysis for the project site. The purpose of the analysis was to determine whether the proposed public water system could deliver required fire flows to the off- and on-site public fire hydrants. The required fire flow for this project has been set at 6,000 to 9,000 gallons per minute (GPM) from four to six fire hydrants flowing simultaneously.²⁵ The project would comply with the requirements contained in **Table III.J-3**. The provision of these fire hydrants would result in a less than significant impact.

The water system delivers adequate fire flow to meet the required demand.²⁶ The existing on-site underground water storage tank would not be needed and would be removed as part of the project. Regulatory compliance measures provided below would ensure that safety measure would be in place during the construction and operational phases of the proposed project. Therefore, impacts related to fire flow would be less than significant.

As shown in **Table III.J-1**, the project site is located in excess of 1 mile of an engine and 1.5 miles of a truck. The LAFD indicates that all projects, including mixed-use projects such as the proposed project should be located within the recommended distances. However, the LAFD indicates that where a response distance is greater than that shown in **Table III.J-1**, automatic fire sprinkler systems and compliance with other regulatory requirements would reduce the project impact. Therefore, the proposed project could result in significant impacts related to fire response distance from an existing land use to a fire station serving the project site; compliance with regulatory requirements would reduce impacts to less than significant.

²⁵ E-mail correspondence, Luke A. Milick, Captain I, Commander, Los Angeles Fire Department, May 12, 2014.

²⁶ Jose Cruz, project manager, Hall & Foremen, Inc, telephone conversation, July 2, 2014

Police Protection

As shown in **Table III.J-7**, the housing component of the proposed project could potentially generate a worst-case scenario of 1,027 residents and 435.3 employees. These persons, along with the mixed-use uses that are proposed, could increase the demand for police services.

The additional residential population resulting from the proposed project would incrementally increase the ratio of residents to police officers from one officer for approximately every 891 persons to one officer for approximately every 895 residents. Although this does not represent a substantial increase, LAPD has indicated that the proposed project would potentially result in a significant impact on police services in the Devonshire area as a result of increased residential use in a previously industrial area resulting in an increased call load.

LAPD suggests that in order to help minimize police protection service calls, the proposed project should incorporate security features for the proposed project during the construction phase. Additionally, the LAPD encourages the developer to provide the Devonshire Community Station with diagrams for every portion of the property that indicate access routes, and any additional information that would facilitate police response. Implementation of **Project Design Features PDF-III.J-1** through **PDF-III.J-3**, **Regulatory Compliance Measures RC-III.J-10** through **RC-III.J-14** and **Mitigation Measures MM-III.J-1** through **MM-III.J-3** would reduce project impacts to police protection services to a less than significant level.

TABLE III.J-7 TOTAL ESTIMATED RESIDENT AND EMPLOYEES POPULATION			
Proposed Use	Square Feet	Residents	Estimated Employees
MGA Headquarters	212,815		250
Leased Creative Office Space	43,000		143
Residential Units (700)		1,027	
Retail	11,000		33
Restaurant	3,000		9
TOTAL	269,815	1,027	435
Number of residents: 1 person multiplied by 304 one bedroom units equals 304 persons 1.75 persons multiplied by 372 two bedroom units equals 651 persons 3.0 persons multiplied by 24 three bedroom units equals 72 persons Number of employees: 250 MGA employees transferring from Van Nuys Campus 43,000 square feet divided by 300 square feet per employee 11,000 square feet divided by 333 square feet per employee 3,000 square feet divided by 333 square feet per employee SOURCE: Water Supply Assessment, April 2014 and Sirius Environmental, 2014.			

Schools

As noted in **Table III.J-8**, the proposed project could generate a total of 196 students. The three schools that would serve the proposed project are Superior Elementary School, Nobel Middle School, and Chatsworth Charter High School. These schools are not at capacity enrollment (based on 2013-2014 enrollment levels), as previously shown in **Table III.J-4**.

Within five years, enrollment in excess of capacity is projected at Superior Elementary School (by one student). In order to reduce potential impacts on overcrowding of schools District-wide, the LAUSD requires payment of mitigation fees for residential and commercial development. Payment of these fees (**RC-III.J-15**) is considered mitigation of any potential impacts on public

school services. Therefore, with the implementation of **Regulatory Compliance Measure RC-III.J-15**, impacts to schools from implementation of the proposed project would be less than significant.

TABLE III.J-8 PROJECT STUDENT GENERATION				
Land Use	Square Footage/ Units	School Type	Generation Factor	Total Student Generation
Commercial	269,815	K-5	0.0234	6.31
		6-8	0.0123	3.32
		9-12	0.0123	3.32
Multi-family Dwelling Unit	700	K-5	0.1266	88.62
		6-8	0.0692	48.44
		9-12	0.0659	46.13
TOTAL				196.14

SOURCE: Los Angeles Unified School District, Developer Fee Program Office, Student Generation Rates, 2014 and Sirius Environmental, 2014.

Parks

Project Design Features

The proposed project would include various shared recreational amenities for use by MGA employees and residents, including a playground, learning center, patio cafes and day care facility. An outdoor amphitheater (with projection screen) is proposed near the MGA corporate facility for employee meetings, social gatherings and (potentially) a defined number of annual community events. Extensive and varied open space would be provided throughout the site, including multiple pocket parks and “village green” areas. An exercise path would line the perimeter of the project site with a separate “dog-park” located on the southwest corner of the project site. Open space and recreational facilities provided for the residential buildings would exceed LAMC requirements of 100 square feet per one-bedroom unit, 125 square feet for two-bedroom unit and 150 square feet for three-bedroom unit. In total, 219,500 square feet of private open space would be incorporated into and around the four residential buildings including: (i) two community rooms, (ii) open courtyards, (iii) 21,000 square feet of private open space/balconies, (iv) 129,000 square feet of common open space and (v) seven roof decks including 29,500 square feet plus a 32,000 square foot roof deck garden on the fifth floor of Building A.

MGA and ancillary creative office employees would also have access to multiple campus amenities, including a pool and clubhouse located atop the shared parking structure on the southern perimeter of the site. A dense collection of trees will be retained south of the MGA building to mitigate solar heat along the southern façade and to provide a soft, natural walking path for employees and project residents.

Public Recreation Plan (PRP)

As discussed above, the PRP's desired long-range Citywide standard for local parks is two acres per 1,000 persons for neighborhood parks plus two acres per 1,000 persons for community parks. However, the PRP also notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of one acre per 1,000 persons for neighborhood parks and

one acre per 1,000 persons for community parks.²⁷ Additionally, the State's Quimby Act allows a local jurisdiction to require a subdivision to provide a maximum of five acres per 1,000 persons in land dedication or fees, unless that particular jurisdiction is already exceeding that ratio.

Currently, City-wide park space is provided at an estimated rate of 0.70 acre per 1,000 residents.²⁸ Therefore, the City neither meets the PRP's desired short- nor intermediate-range or long-range standards.

Based on the estimated 1,027 residents generated by the project, the project would require 2.05 acres of neighborhood parkland to meet the PRP's long-range standard and 1.03 acres to meet the PRP's short- and intermediate-range standard. The project would include 219,500 square feet (5.04 acres) of combined public and private open space, including multiple pocket parks and "village green," ground and rooftop open space areas, and other amenities. While the on-site open space would not be in a neighborhood park, it would serve to provide passive recreational outdoor space for project residents, as well as recreational/exercise facilities. Therefore, the project satisfies the City's long-range standard as well as the short-range and intermediate range standards for neighborhood parks.

With the project's common open space and recreational opportunities, the use of existing community parks in the area would also be minimized. Nevertheless, residents (and some employees) of the proposed development, particularly children, would be expected to utilize community parks (i.e., baseball, basketball, volleyball, and tennis courts, etc.) where these facilities are not included in the on-site recreation and open space amenities. The open space on the project site could be credited towards the City's long-range and short-range standards for community parks, though impacts relative to the PRP would be significant prior to mitigation. Implementation of the mitigation measure below would ensure that the intent of the PRP's parkland standards would be met through the dedication of parkland, payment of in-lieu fees (less any applicable credits), provision of on-site recreational amenities and open space areas, or through a combination of these methods. Furthermore, implementation of the mitigation measure would ensure that the project would comply with the parks and recreational requirements set forth by the LAMC (discussed below).

City of Los Angeles Municipal Code (LAMC)

As previously discussed, Section 12.21 of the LAMC requires that all buildings containing six or more dwelling units on a lot provide a minimum square footage of usable open space per dwelling unit. Based on the proposed dwelling unit types, the project would be required to provide a total of 81,100 square feet (1.86 acres) of usable open space, as shown in **Table III.J-9**. As noted above, a total of 219,500 square feet (5.04 acres) of public and private open space would be available to residents and employees; of this total, 198,500 square feet would be common open space (of which approximately 69 percent would be landscaped) and 21,000 square feet would be private open space.

²⁷ City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan. Approved October 9, 1980.

²⁸ City of Los Angeles, Department of City Planning memo, February 6, 2009.

TABLE III.J-9 SECTION 12.21 LAMC - OPEN SPACE REQUIRED AND PROVIDED BY THE PROJECT			
Open Space Requirement	Quantity	Requirement (SF/Unit)	Total Required
DU with 1 bedroom	304 DU	100 SF/DU	30,400 SF
DU with 2 bedrooms	372 DU	125 SF/DU	46,500 SF
DU with 3 bedrooms	24 DU	175 SF/DU	4,200 SF
TOTAL			81,100 SF
OPEN SPACE PROVIDED			
Open Space Proposed	Quantity	Size	Total Provided
OPEN SPACE			
Multiple pocket parks, village green areas, outdoor amphitheater, exercise path, dog park, community rooms, open courtyards, pool, clubhouse	Mixture of public and private open space throughout the project	219,500 SF	219,500 SF
PRIVATE OPEN SPACE SUBTOTAL		219,500 SF	219,500 SF
TOTAL			219,500 SF

Source: Los Angeles Recreation and Parks Department and Sirius Environmental, 2014.

Thus, the proposed project would substantially exceed the Section 12.21 requirement for the provision of usable open space. According to Section 12.21 of the LAMC, common open space must constitute at least 50 percent of the total required usable open space requirement. The project would also exceed this requirement. Additionally, per Section 12.21, a minimum of approximately 25 percent of the common open space must be planted with ground cover, shrubs, and trees. This requirement would be fulfilled under the proposed project.

As previously stated, Section 17.12 of the LAMC, the City's parkland dedication ordinance enacted under the Quimby Act, provides a formula for satisfying park and recreational uses through parkland dedication and/or the payment of in-lieu fees. For the project's proposed density of 29.66 dwelling units per acre,²⁹ approximately 12.2 percent³⁰ of the project's gross area would be required to be dedicated as parkland. Based on this formula and the gross lot area of 23.6 acres, the project would be required to do one of the following: dedicate approximately 2.9 acres (126,324 square feet) of park and recreation space,³¹ or pay the applicable in-lieu fees.³² Of the 219,500 square feet of usable open space, all of it would be available as common area and passive recreation space, which could be credited toward the 2.9 acres parkland dedication and/or in lieu fee requirements of Section 17.12. It will be up to the Department of Recreation and Parks and the Advisory Agency to determine the acceptability of project open space to meet these requirements.

²⁹ 700 rental units divided by 23.6 acres.

³⁰ 12.2 percent of dedicated parkland (required per LAMC, Section 17.12 B) for projects proposing density as follows: 20 dwelling unit/acre to less than 30 dwelling unit/acre. LAMC: [http://www.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:losangeles_ca_mc](http://www.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc)

³¹ LAMC, Section 17.12 B.

³² City of Los Angeles Department of City Planning, memo, February 19, 2013: <http://www.cityplanning.lacity.org/eforms/notices/quimbyfees.pdf>. Website accessed on June 22, 2014.

The project would likely increase demand for existing community parks, particularly recreation facilities oriented toward children and impacts relative to the PRP could be significant prior to mitigation. Implementation of **Regulatory Compliance Measure RC-III.J-17** below would ensure that the intent of the PRP's parkland standards would be met through the dedication of parkland, payment of in-lieu fees (less applicable credits), provision of on-site recreational amenities and open space areas, or through a combination of these methods. Therefore, impacts relative to compliance with Section 17.12, the implementing ordinance of the Quimby Act, would be less than significant assuming that project open space is found acceptable to meet requirements and/or the applicant pays the in-lieu fee found appropriate by the Department of Recreation and Parks and the Advisory Agency.

As stated previously, most communities of Los Angeles, in comparison with other large metropolitan areas in the United States, have less parkland per number of residents. The additional 1,027 residents anticipated under the proposed project would result in additional demand for parkland. While the proposed project would not include the addition of any parkland, it would include passive recreational activities and other recreational amenities as previously described. The two gym facilities would be oriented towards project residents and employees and as such, it would not be considered to contribute to the project's parkland dedication. No recreational facilities specifically oriented towards children are proposed. However, the pocket park and "village green" areas, as well as the swimming pool in the fitness club may be attractive to children.

In conclusion, the project would meet the requirements set forth in Section 12.21 of the LAMC, and could be found to meet the parkland dedication requirements of Section 17.12 of the LAMC. However as stated above, the project would likely increase demand for existing community parks, particularly recreation facilities oriented toward children and impacts relative to the PRP could be significant prior to mitigation. Implementation of **Regulatory Compliance Measures RC-III.J-16** and **RC-III.J-17** below would ensure that the intent of the PRP's parkland standards would be met through the dedication of parkland, payment of in-lieu fees, provision of on-site recreational amenities and open space areas, or through a combination of these methods. Furthermore, implementation of the **Regulatory Compliance Measures RC-III.J-16** and **RC-III.J-17** would ensure that the project would comply with the parks and recreational requirements set forth by the LAMC.

Libraries

The housing component of the proposed project could potentially generate a worst-case scenario of 1,027 residents. The increase in residential population could increase the demand for library services. As stated above, four libraries serve the project site: the Chatsworth Branch Library, Canoga Park Branch Library, Northridge Branch Library, and the Porter Ranch Branch Library.

According to the Los Angeles Public Library Branch Facilities Plan *Criteria for New Libraries*, a 14,500 square foot facility is required to serve a population above 45,000 and a 12,500 square foot facility is required to serve a population below 45,000.³³ As shown in **Table III.J-6**, none of the branch libraries currently serving the project site meet this standard and presently serve populations greater than 45,000 (excepting Porter Ranch which serves 35,000 persons and is

³³ http://173.196.26.171/about/Branch_Facilities_Criteria.pdf. June 23, 2014.

comprised of a 12,300 square foot facility) within facilities that are 12,500 square feet in size. The Los Angeles Public Library also recommends that when a community reaches 90,000 persons that a new branch library should be considered.³⁴ Although the Los Angeles Public Library Branch Facilities Plan indicates that 19 proposed projects for expansions or new libraries are planned, no new libraries are proposed for the project area.³⁵ The Los Angeles Public Library recommends that a \$200.00 per capita mitigation fee be paid by developers to off-set costs to branch libraries serving their project sites.³⁶

As noted in **Table III.J-6**, none of the four library branches serving the project site have exceeded the 90,000 community population threshold and are well below this level. The additional 1,027 residential population expected under the project would not result in substantial adverse physical impacts associated with libraries and therefore, impacts to library services would be less than significant.

The following include regulatory compliance and mitigation measures applicable to the proposed project and necessary to reduce impacts to less than significant levels.

PROJECT DESIGN FEATURES

POLICE PROTECTION

PDF-III.J-1 During project construction, the applicant shall implement security measures at the construction sites that are accessible to the general public. Security measures could include, but are not limited to, fencing, security lighting, and providing security personnel to patrol construction sites.

PDF-III.J-2 During project design, the applicant shall incorporate project design features consistent with the City Police Department's Design Out Crime Guidelines, which may include providing an on-site security force, illuminating parking lots with artificial lighting, use of closed-circuit television monitoring and recording of on-site areas, maintaining security fencing along the project site edge to restrict public access, and way-finding lighting.

PDF-III.J-3 The applicant shall design on-site streets, street lighting, and street signage in accordance with the emergency access requirements of the applicable jurisdiction (i.e., City of Los Angeles or County of Los Angeles). The applicant shall submit to the City for review the design plans for on-site street widths, street lighting, and street signage.

PARKS

The project includes ample on-site open space throughout the project that would exceed regulatory requirements.

³⁴ Los Angeles Public Library, correspondence, 2014.

³⁵ http://173.196.26.171/about/Branch_Facilities_Project_List.pdf; accessed June 23, 2014,

³⁶ Los Angeles Public Library, correspondence 2014.

REGULATORY COMPLIANCE MEASURES

FIRE PROTECTION

- RC-III.J-1** Project building plans shall include the submittal of a plot plan for approval by the Los Angeles Fire Department either prior to the recordation of the final map or the approval of a building permit.
- RC-III.J-2** The applicant shall consult with the Fire Department and incorporate fire prevention and suppression features appropriate to the design of the project.
- RC-III.J-3** Definitive plans and specifications shall be submitted to the Fire Department and requirements for necessary permits satisfied prior to commencement of any portion of the project.
- RC-III.J-4** Any required fire hydrants to be installed shall be fully operational and accepted by the Fire Department prior to any building construction.
- RC-III.J-5** Plot plans indicating access driveways and roads and turning areas shall be reviewed and approved by the Fire Department, prior to the issuance of a building permit.
- RC-III.J-6** During the construction phase, emergency access shall remain clear and unobstructed. A construction staging and traffic management plan, wherein traffic management personnel (flag persons) shall be employed as necessary to ensure emergency access is maintained, consistent with LAFD requirements.
- RC-III.J-7** The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles C.P.C. 19708).
- RC-III.J-8** All access roads, including fire lanes, shall be maintained in an unobstructed manner, removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area in accordance with Section 57.09.05 of the Los Angeles Municipal Code.
- RC-III.J-9** The project shall comply with all applicable State and local Codes and Ordinances found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles. In particular, the project shall include an on-site sprinkler system.

POLICE PROTECTION

- RC-III.J-10** During the project's construction phase, the applicant shall ensure adequate through access and emergency access to adjacent uses.
- RC-III.J-11** The applicant shall consult with the Police Department and comply with recommended security features for the construction site(s), including security

fencing, locked entrances, lighting, and the use of a seven-day, 24-hour security patrol.

RC-III.J-12 Upon completion of the project, the applicant shall provide the Devonshire Division Commanding Officer with access routes and other information that might facilitate police response, as requested by the LAPD.

RC-III.J-13 The applicant shall provide project plans to the LAPD Crime Prevention Unit to determine any additional crime prevention and security features appropriate to the design of the project. Any additional design features identified by the LAPD Crime Prevention Unit shall be incorporated into the project's final design and to the satisfaction of LAPD, prior to issuance of a Certificate of Occupancy for the project.

RC-III.J-14 The project shall incorporate design guidelines relative to security, semi-public and private spaces, which may include, but not be limited to, access control to buildings, secured parking facilities, walls/fences with key systems, well illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas and provision of security guard patrol throughout the project site if needed.

SCHOOLS

RC-III.J-15 Applicant of the proposed project would be expected to pay required developer school fees to LAUSD pursuant to Government Code Section 65995, as amended by Senate Bill 50, to help reduce any impacts on school services.

PARKS

RC-III.J-16 The applicant shall provide open space through one of the following 1) provide on-site improvements as determined to be in compliance with City of Los Angeles requirements; or 2) pay in-lieu fees for any open space shortfall as determined by the City of Los Angeles Recreation and Parks Department.

MITIGATION MEASURES

POLICE PROTECTION

MM-III.J-1 Prior to the issuance of the first building permit issued, the applicant shall consult with the City Police Department regarding site-wide crime prevention features, which may include: provision of call boxes in parks and/or other strategic locations for police and medical emergencies; payphones restricted to outgoing calls only; and "graffiti" cameras in strategic locations to discourage problem graffiti areas from arising.

MM-III.J-2 Prior to the issuance of each building permit, the applicant shall incorporate crime prevention features appropriate to the operational characteristics of the individual building. These features may include the following elements:

- Well illuminated and designed entryways with minimum dead space to eliminate areas of concealment;
- Ornamental shrubbery not planted in a way that would provide cover for persons tampering with doors or windows;
- For residential development, installing doors with hinges on the inside or in a manner which prohibits pin removal or tampering, where feasible and effective
- The incorporation of access for emergency service personnel and vehicles;
- For residential development, video cameras and private security guards may be used to monitor and patrol the project site during project construction and operation; and
- Entryways, elevators, lobbies, and parking areas with lighting that eliminates areas of concealment; and solid core doors with deadbolt locks to all offices and shops.

MM-III.J-3 No later than six months following the issuance of a certificate of occupancy for 700 residential units the Applicant or its successor shall provide to the City of Los Angeles Police Department at no rent the non-exclusive use of desk space for two officers within a community serving facility at the project site.

LIBRARIES

MM-III.J-4 Prior issuance of a Certificate of Occupancy, the applicant will be required to pay a \$200.00 per capita mitigation fee (1,027 residents X \$200.00 = \$205,400) to the LAPL in order to off-set costs to branch services libraries.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts to public services (i.e. fire protection, police protection, schools, parks and libraries) would be less than significant.

CUMULATIVE IMPACTS

This analysis is based on the projects identified in **Table III.K-8, Related Projects**, in Section III.K Transportation and Circulation. The related projects include various commercial/mixed-use, office, and residential projects located in the vicinity of the project that are currently under construction, approved but not built, or proposed for development.

FIRE PROTECTION

The proposed project, in conjunction with the related projects, would increase the residential and employment population in the area. The residential population of the cumulative projects (including the project) is estimated at 8,344 persons; the number of employees is estimated at 900. The increased population could increase demand for fire protection services. Implementation of **Regulatory Compliance Measures RC-III.J-1 through RC-III.J-9** would reduce the proposed project's impacts to fire protection services to less than significant levels. Similar to the proposed project, each of the related projects would be individually subject to LAFD review and would be required to comply with all applicable fire safety requirements of the LAFD. The proposed project is not anticipated to result in a cumulatively considerable impact to fire protection services.

POLICE PROTECTION

The proposed project, in conjunction with the related projects, would increase the residential and employment population in the area. The residential population that would be added by cumulative projects is estimated at 8,344 persons and the number of employees is estimated at 900. The increased population could increase demand for police protection services. Implementation of **Project Design Features PDF-III.J-1** through **PDF-III.J-3**, **Regulatory Compliance Measures RC-III.J-10** through **RC-III.J-14** and **Mitigation Measures MM-III.J-1** through **MM-III.J-3** would reduce the proposed project's impacts to police protection services to a less than significant level. Similar to the proposed project, each of the related projects would be individually subject to LAPD review in order to adequately address police protection service demands. Therefore, the proposed project is not anticipated to result in a cumulatively considerable impact to police protection.

SCHOOLS

Several of the related projects would include residential developments that could include generate school-age children and could have a potential impact on school capacity. Cumulative development (including the project) would generate a total of 2,595 new dwelling units; an estimated 867 new students would be generated by the commercial and residential development (including the project). Payment of mitigation fees as described in **Regulatory Compliance Measure RC-III.J-15**, the proposed project would have less than significant impacts on public school services. Therefore, the proposed project is not anticipated to result in a cumulatively considerable impact to schools.

PARKS

Several of the related projects would include residential developments that would increase the residential population of the area and could potentially increase demand on parks and recreational facilities. The residential population (including the project) would increase by approximately 8,344 persons. Based on the estimated 8,344 residents generated by cumulative projects, a total of 16.6 acres of neighborhood parkland would be required to meet the PRP's long-range standard and 8.3 acres would be required to meet the PRP's short- and intermediate-range standard. Based upon Section 12.21 of the LAMC, the total cumulative open space required by the residential projects would include the provision of up to 324,375 square feet of useable open space.³⁷ As identified above, the proposed project would include recreational amenities for its residential population. Additionally, the applicant of the proposed project would be required to comply with in-lieu fees as described in **Regulatory Compliance Measures RC-III.J-16** and **RC-III.J-17**. Impacts associated with cumulative growth could also be reduced through the inclusion of similar recreational amenities on specific project sites and payment of Quimby fees by each project. The proposed project would have a less than significant impact on parks and recreational facilities, and as such, would not result in a cumulatively considerable impact on parks and recreational facilities.

³⁷ 2,595 dwelling units (assumes 3 habitable rooms, since actual is not known for all development) X 125 square feet equaling 324,375 square feet.

LIBRARIES

Several of the related projects include residential developments that would increase the residential population (by an estimated 4,861 people) of the area and could potentially increase demand on public library services. However, individual projects would undergo review to determine potential impacts to library services and appropriate mitigation would be provided. As stated earlier, LAPL has developer fees and other guidelines to determine impacts to their facilities to address impacts on the existing library services. Consequently, the proposed project would not result in a cumulatively considerable impact on library services.