

4.9 PUBLIC SERVICES

This section analyzes potential impacts relating to police, fire protection, and schools. Impacts to parks are discussed in Section 4.10, *Recreation*.

4.9.1 Setting

a. Fire Protection Service. The Los Angeles Fire Department (LAFD) provides fire prevention, fire suppression, and life safety services within the City of Los Angeles. The LAFD's 3,586 uniformed personnel provide fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service. There are 1,104 firefighters on duty each 24-hour period at LAFD's 106 neighborhood City of Los Angeles Emergency Operations Centers located across the 471 square mile jurisdiction. In 2008, LAFD responded 753,428 times throughout the City. The LAFD tries to respond to every emergency call in the City within 5 minutes (all from <http://lafd.org/about.htm>, accessed 10/13/09).

The project site is located within Battalion 1 of Division 1, which has jurisdiction over a 9.2 square mile area. Battalion 1 has five City of Los Angeles Emergency Operations Centers, including stations 3, 4, 9, 10, and 17. The City of Los Angeles Emergency Operations Center closest to the project site is Station #4, located at 450 E. Temple Street, immediately adjacent to the eastern border of the project site. Due to the location of Station #4 and existing resources, fire protection services are currently adequate to meet the needs in the project site vicinity (Inspector John Dallas, 11/16/09). The response time to the project site would be approximately one minute (Capt. Williams, 11/17/09). Additional fire protection services are provided by stations 3 and 9, both of which are part of Battalion 1. Stations #10 and 17 are located approximately 2 miles to the south of the project site. City of Los Angeles Emergency Operations Center #2, within Battalion 7, is located approximately 1.5 miles to the east of the project site and could provide emergency services if needed. Existing City of Los Angeles Emergency Operations Centers serving the project site, along with a location and description of their equipment, are listed in Table 4.9-1. Station locations are shown on Figure 4.9-1.

Fire Flow. Fire flow requirements are closely related to land use and the quantity and availability of water necessary for fire protection. The City of Los Angeles Department of Water and Power (LADWP) provides water for fire flows in the project site vicinity. All water mains and lines that are designed and sized according to LADWP standards take into account fire flow and pressure requirements. Please refer to Section 4.12, *Utilities*, for a discussion of water service infrastructure in the project site vicinity.

Currently, there are three Four-inch Double (4D) fire hydrants located on the project site. These include hydrants midblock along Alameda Street, at the corner of Alameda Street/Turner Street, and one across the intersection of Turner Street/Temple Street along the northern boundary of the project site. Additionally, there are three 4D hydrants located south of the project site across 1st Street. 4D fire hydrants typically feed off 8" to 10" water mains that provide about 1,400 gallons per minute (gpm) at 20 pounds per square inch (psi).

**Table 4.9-1
City of Los Angeles Emergency Operations Centers and Equipment**

| Station No. | Location | Equipment |
|----------------|------------------------------|---|
| 2 ^a | 1962 E Cesar Chavez Avenue | <ul style="list-style-type: none"> • Task Force (two engines and one truck) • One rescue battalion chief sedan • Staff of 14 |
| 3 ^b | 108 N. Freemont Avenue | <ul style="list-style-type: none"> • Task Force (two engines and one truck) • Two Rescues • USAR Element • Staff of 16 |
| 4 ^c | 450 E Temple Street | <ul style="list-style-type: none"> • HAZMAT • Task Force (two engines and one truck) • BALS Ambulance • Paramedic Ambulance • Battalion Chief • Staff of 20 |
| 9 ^d | 430 E 7 th Street | <ul style="list-style-type: none"> • Task Force (two engines and one truck) • Two Rescues • Staff of 14 |

Sources: Los Angeles Fire Department, website, www.lafd.org, accessed 10/12/09.

^a Captain Frank Cornejo, Station 2, October 19, 2009.

^b Firefighter Grijalva, Station 3, March 19, 2009.

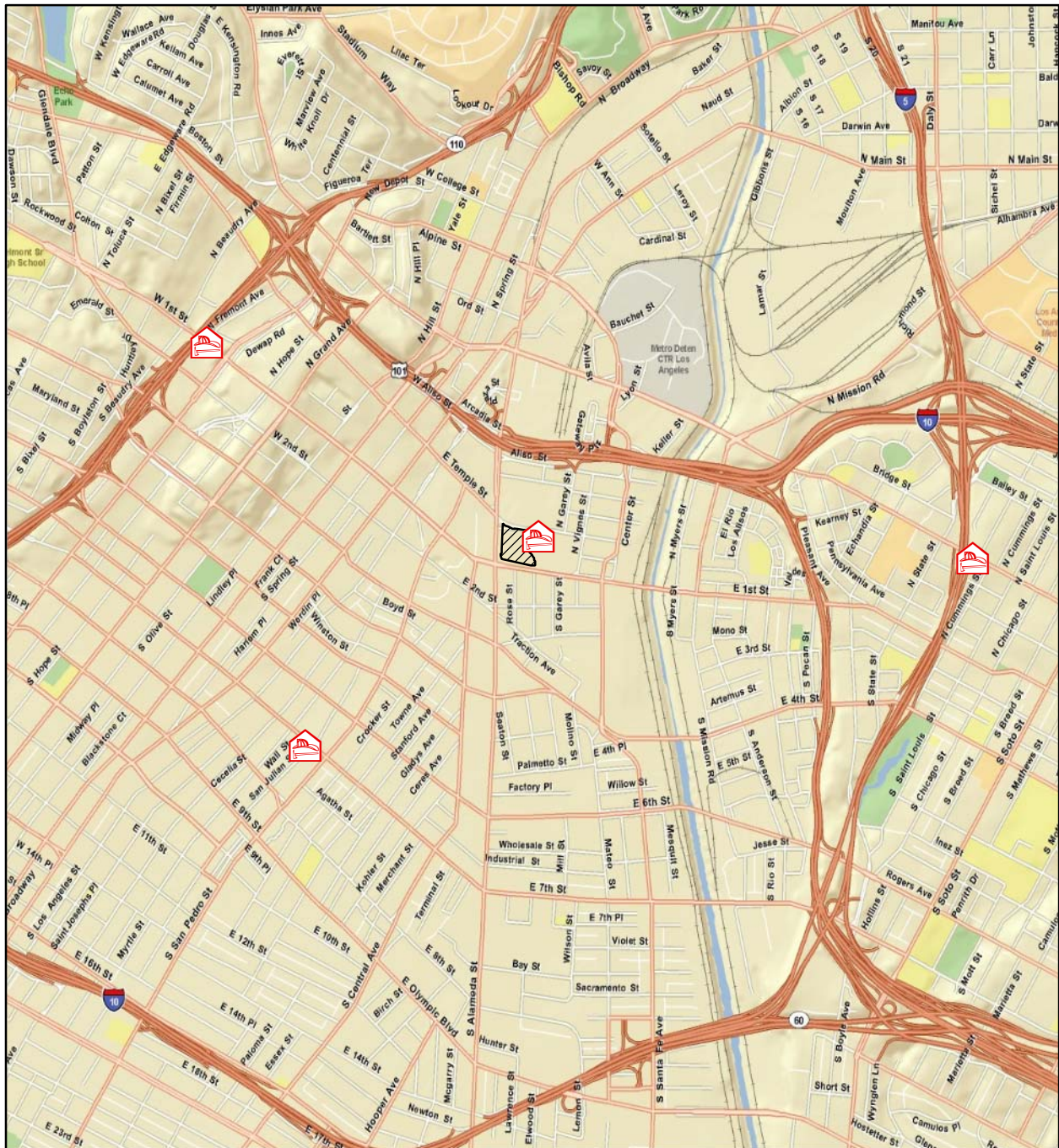
^c Firefighter Williams, Community Liaison Unit, March 24, 2009.

^d Captain Calder, Station 9, March 24, 2009.

Fire Regulatory Setting. The LAFD includes regulations pertaining to fire flows, response distance, and emergency access that apply to structural development. Division 9 of the Los Angeles Fire Code addresses these factors. Regulations for these factors are identified below.



Fire Flows and Hydrants. 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). Division 9 (Sec. 57.09.06) establishes fire flow standards.

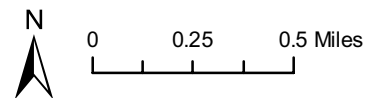
Fire flow is defined as the quantity of water available or needed for fire protection in a given area and is normally measured in gallons per minute (gpm), as well as duration of flow. City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 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. As onsite development includes high-density commercial buildings, the fire flow requirement is 12,000 gpm available to any block. A minimum residual water pressure of 20 pounds per square inches (psi) is required to remain in the water system in addition to the required gpm water flow.



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Legend

-  Fire Station Location
-  Project Site



Fire Station Locations

Figure 4.9-1
City of Los Angeles



Fire hydrant spacing and hydrant type are also determined according to land use. For high-density residential uses, one hydrant per 100,000 square feet of land is required with a 300 to 450 feet distance between hydrants (Sec. 57.09.06). For industrial and commercial uses, one hydrant per 80,000 square feet is required with 300 feet between hydrants.

Response Distance and Times. The Fire Code specifies maximum response distances allowed between specific locations and Engine/Truck companies, based upon land use and fire flow requirements. Section 57.09.06 of the Fire Code limits the maximum response distance from a high-density residential development and high-density commercial or industrial development to a City of Los Angeles Emergency Operations Center to 1.5 miles and 1.0 mile, respectively. When response distances exceed these requirements, all structures must be equipped with automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems, etc.). The Fire Code also requires the provision of automatic fire sprinkler systems in high-rise developments.

Response time relates directly to the physical linear travel distance (i.e., the number of miles between a City of Los Angeles Emergency Operations Center 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 (LOS), weather conditions, and construction traffic along the response route can affect the response time.

Emergency Access. Every first story of a residential unit and all first story portions of any commercial or industrial building must be within 300 feet of an approved hydrant. Division 9 (Sec. 57.09.08) also provides for supplemental fire protection in which equipment and systems not otherwise required in the LAMC may be required by the LAFD. All portions of the exterior walls of any structure, other than a residential structure, must be no more than 150 feet from where a Fire Department emergency vehicle would park if responding to an emergency in your building. The door to the furthest dwelling unit in a residential structure (single family dwellings, apartments, condominiums, hotels, motels, etc) must be no more than 150 feet from where a Fire Department emergency vehicle would park.

A fire lane on your property must be provided if your structure is located more than 150 feet from a public street. A fire lane must be at least 20 feet wide and be kept free of obstructions (including parked cars) at all times (add 8 feet of width for each lane of parallel parking). A gate may be installed across a fire lane with the approval of the Fire Department but may not reduce the required width. If a fire lane is providing access to a private fire hydrant, the fire lane must be 28 feet wide for 30 feet either direction from the fire hydrant. If the fire lane is providing access to a building 28 feet or taller at the roof edge, the fire lane must be 28 feet wide along the building. Fire lanes must have 14 feet of unobstructed overhead clearance. Fire Lanes must terminate at a public street or an approved turn-around and must meet the Department of Public Works, Bureau of Engineering standard for paving a public alley.

b. Police Protection Services. The Los Angeles Police Department (LAPD) provides police protection service throughout the City of Los Angeles. The project site is located within the Central Area of the LAPD's Central Bureau. The Central Area includes the Central Community police station located at 251 E. 6th Street. Additionally, the new LAPD

headquarters building is located across City Hall on 1st Street, approximately 0.5 miles from the project site.

The Central Community Police Station serves an area that encompasses approximately 4.5 square miles and is responsible for all police operations in downtown Los Angeles. The Central Community Police Station employs approximately 400 sworn officers within the Central Area. As such, given the population of the Central Area of 40,000 residents, there is about one officer for every 100 residents. There are approximately 30 patrol officers on duty at any one time, with additional Safe City, detectives, and Business Improvement District (BID) officers on duty. Response times within the plan area are about 2 ½ minutes for emergency calls and 4 ½ minutes for citizen response times. Additionally, the LAPD is currently able to handle police demands within the project site vicinity (all from Sgt. Kent, LAPD, 2009).

The Central Community Police Station includes three substations to provide easier access to police services throughout the Central Area. The closest substation to the project site is the Little Tokyo Drop-In Center located at 307 E. 1st Street, approximately 600 feet west of the project site. Other substations include the ARCO Plaza Drop-In Center and the Chinatown substation. Figure 4.9-2 shows the locations of the police stations that serve the project site.

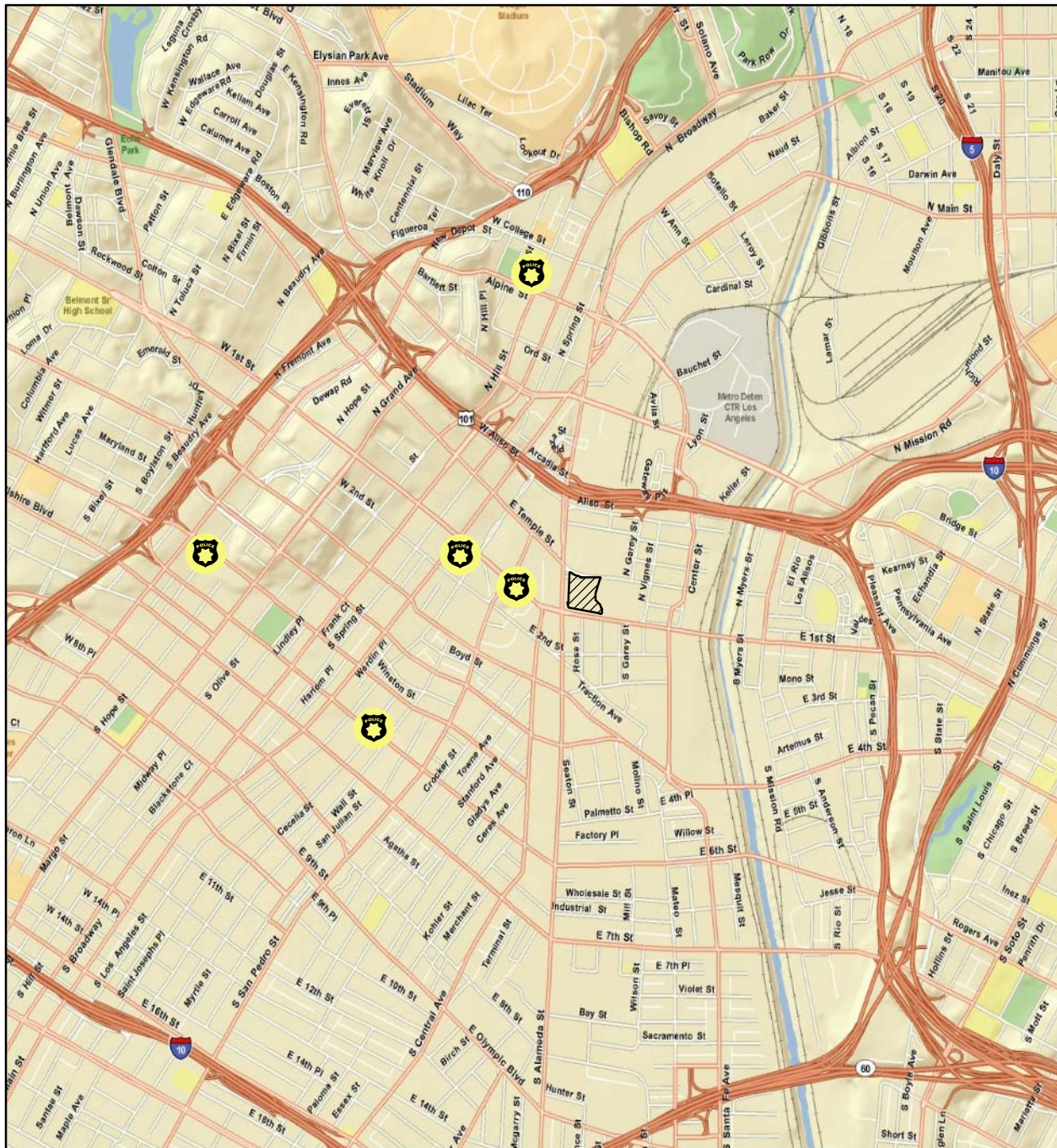
As illustrated in Table 4.9-2, the Central Area had 2,983 Part 1 crimes in 2008, with the predominant crimes being burglary theft from vehicle and personal/other theft. Based on an approximate population of 40,000 in the Central Area, this is approximately 7.2 crimes per 100 persons. This is about 230% below the City average of approximately 23.8 crimes per 100 persons, based on a City population of 4,003,000 in 2008.

Table 4.9-2
Part 1 Crime Statistics (2008)

| Crime | Central Area | City of Los Angeles |
|-----------------------------|--------------|---------------------|
| Homicide | 4 | 286 |
| Rape | 34 | 646 |
| Robbery | 393 | 9,987 |
| Aggravated Assault | 373 | 9,354 |
| Burglary | 240 | 14,542 |
| Grand Theft Auto | 319 | 16,921 |
| Burglary Theft from Vehicle | 609 | 22,548 |
| Personal/Other Theft | 1,011 | 21,134 |
| Total | 2,983 | 95,418 |

Source: LAPD, COMPSTAT, available at www.lapdonline.org. Accessed 10-13-09.

Police Regulatory Setting/Standards. All law enforcement agencies within California are organized and operate in accordance with the applicable provisions of the California Penal



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Legend



Police Station Location



Project Site



0 0.25 0.5 Miles

Police Station Locations

Figure 4.9-2

City of Los Angeles

Code. This code sets forth the authority, rules of conduct, and training for police officers. Under State law, all sworn municipal and county officers are state police officers. 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.

Response time is the amount of time from when a call requesting assistance is made until the time that a police unit responds to the scene. Calls for police assistance are prioritized based on the nature of the call. Unlike fire protection services, police units are most often in 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.

The LAPD has recommended that developers of large-scale projects contact the LAPD for advice with regard to crime prevention features that may be incorporated into the onsite development's design.

c. Schools. The Los Angeles Unified School District (LAUSD) provides kindergarten through 12th grade public school services throughout Los Angeles. The LAUSD is divided into eight Local Districts (Districts 1-8). The project site is located within Local District 4, which includes 15 early education centers, 49 elementary schools, 10 middle schools, 18 high schools, and 5 continuation high schools (Glenn Striegler, Environmental Assessment Coordinator, 2009). Table 4.9-3 lists the LAUSD schools and charter schools along with the most recent student enrollment and capacity figures that would serve the project site.

Table 4.9-3
LAUSD Schools that Serve the Project Site Vicinity

| Name | Enrollment (2008-2009) | Grades Served |
|-------------------------------------|-----------------------------------|--------------------------|
| Utah Elementary | 518 | K-8 |
| School for Visual Arts & Humanities | 432 | 9-12 |
| Leadership Academy | 437 | 12 |
| LA Teacher Prep Academy | 244 | 9-10 |
| LA High School of the Arts | 403 | 9-12 |
| Contreras Learning Complex | 934 | 9-12 |
| Belmont Senior High School | 1,475 | 9-12 |
| Roybal High School | 1,712 | 9-12 |
| Lincoln High School | 2,760 | 9-12 |
| LA Global Studies | 380 | 9-12 |

Source: School Branch Information, LAUSD, 2009; California Department of Education, DataQuest, 2009.

School Regulatory Setting/Policies. School regulations include the LAUSD open enrollment policy and the requirement for development projects to pay impact fees. These regulations are identified separately below.

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.

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

Development on the project site would be required to pay state-mandated school impact fees. Pursuant to Section 65995 (3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees “...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization.” With payment of these fees impacts would be less than significant.

Pursuant to Section 65995.5-7 of the California Government Code, the LAUSD has imposed Level 2 residential developer fees at a rate of \$3.83 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.

4.9.2 Impact Analysis

a. Methodology and Significance Thresholds. The methodology and significance thresholds for each public service are discussed separately below.

Fire Services. Impacts associated with fire services are based on written and verbal correspondence with LAFD staff. Adequate fire flows are determined using LAFD methodology and regulations for distance, land use, flows, and hydrant access. The LAFD does not determine the adequacy of fire protection based on response times or number of Emergency Medical Services (EMS) or fire-related incidents. Response distance and times analysis is based on LAFD regulations pertaining to distance and times are based on LOS ratings of the existing street segments in the project site vicinity.

Appendix G of the CEQA Guidelines. Based on Appendix G of the *CEQA Guidelines*, a project may have a significant environmental impact if it were to:

- a) *Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection.*

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

- a) *A project would normally have a significant impact on fire protection if it required the addition of a new City of Los Angeles Emergency Operations Center or the expansion, consolidation or relocation of an existing facility to maintain service.*

Police Services. Impacts associated with police services are dependent on the need for a new or physically altered police station to achieve police protection of onsite development. The analysis of police services is dependent upon written and verbal correspondence with LAPD staff. Impacts are further analyzed by using the officer-to-population ratios for the existing conditions and the existing plus onsite development conditions. Response time analysis is based on the LOS ratings of the nearby traffic conditions.

Appendix G of the CEQA Guidelines. Based on Appendix G of the *CEQA Guidelines*, a project may have a significant environmental impact if it were to:

- a) *Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection.*

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

- a) *The population increase resulting from the proposed project, based on the net increase of residential units or square footage of non-residential floor area;*
- b) *The demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and*
- c) *Whether the project includes security and/or design features that would reduce the demand for police services.*

School Facilities. The environmental impacts of onsite development with respect to schools are determined based on the enrollment and capacity of existing and reasonably foreseeable proposed schools in the project site vicinity, and the number of students that onsite development would generate. Based on these projections, it is determined whether onsite

development would exceed the capacity of any existing or proposed schools such that a new or expanded school would be needed.

Appendix G of the CEQA Guidelines. Based on Appendix G of the CEQA Guidelines, a project may have a significant environmental impact if it were to:

- a) *Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools.*

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

- a) *The population increase resulting from the proposed project, based on the increase in residential units or square footage of non-residential floor area;*
- b) *The demand for school services anticipated at the time of project buildout compared to the expected level of service available. Consider as applicable, scheduled improvements to LAUSD services (facilities, equipment and personnel) and the project's proportional contribution to the demand;*
- c) *Whether (and the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and*
- d) *Whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).*

b. Project Impacts and Mitigation Measures.

Impact PS-1 **Although onsite development would incrementally increase demands on City of Los Angeles Emergency Operations Center #4, the proximity of the project site to City of Los Angeles Emergency Operations Center #4 would allow for adequate response times. Additionally, onsite development would be required to comply with LAFD building requirements. However, there is currently insufficient hydrant coverage on the project site to accommodate onsite development. Therefore, impacts related to fire protection would be significant but mitigable.**

Onsite development would introduce an estimated 1,526 new residents in 528 dwelling units as well as approximately 750,000 square feet of onsite non-residential development (See Initial Study, Appendix A). This increase would incrementally increase calls for fire service. However, because the project site is within the current LAFD service area and is located adjacent to Station #4, onsite development would be able to be adequately served by the current fire facilities (Inspector John Dallas, LAFD, November 2009). Therefore, no new or expanded facilities would be required.

As indicated above in Section 4.9.1, *Setting*, the project site is located adjacent to City of Los Angeles Emergency Operations Center #4 and would have a response time of approximately one minute. Existing traffic conditions in the area have the potential of impacting response times; however, due to the proximity of the project site to the City of Los Angeles Emergency Operations Center, response times would not be significantly affected.

As indicated above, the fire flow pressure on the site is associated with the adjacent water mains of the project site. Water mains along Alameda Street and Turner Street are 8" mains connected to 4D hydrants. Per conversations with LAFD staff, fire flow should be sufficient to meet the proposed development needs (Inspector John Dallas, LAFD, November 2009). A 12" main is located along 1st Street to the south of the project site. As such, impacts associated with fire flow pressure would be less than significant.

As indicated in the *Setting*, there are three 4D hydrants on the project site, located along Alameda Street and Temple Street. Per LAFD requirements, hydrants must be within 300 feet of one other and must provide adequate coverage of the development on the project site. Therefore, since there are no hydrants located on the south side of the project site along 1st Street, there is insufficient coverage for onsite development. Although there are three 4D hydrants to the south of the project site across 1st Street, the LAFD does not count these toward coverage as it is across a busy street. The LAFD would use these hydrants only in an extreme emergency situation. Additionally, fire lanes would need to be established so as to provide sufficient access. Therefore, impacts associated with the availability of hydrants and fire access would be potentially significant.

Mitigation Measures. Standard City mitigation and site specific mitigation measures are proposed to reduce potential impacts.

Standard City Mitigation/Regulations. Impacts associated with fire protection response was found to be less than significant, however, the City of Los Angeles has standard mitigation measures that would further reduce any potential impacts. Therefore, the following mitigation measures shall be included in the design of onsite development:

- PS-1(a) Standard LAFD Regulations.** The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

Site-Specific Mitigation. Implementation of onsite development would result in potentially significant impacts associated with hydrant coverage and access. The following mitigation was developed based on preliminary personal communications with Inspector John

Dallas of the LAFD. It should be understood that specific requirements may change upon plan review with the LAFD.

PS-1(b) Hydrant Coverage. The applicant shall be responsible for changing out all 4D fire hydrants on the project site to 2 ½ X 4D hydrants and installing a 2½ X 4D fire hydrant at the midpoint of the project site along the north of 1st Street to meet fire coverage requirements.

PS-1(c) Hydrant Access. The applicant shall incorporate fire lanes to provide adequate access for the LAFD. Building plans showing the hydrant and coverage area shall and fire lanes shall be submitted to the LAFD for review prior to the issuance of a building permit.

Significance after Mitigation. The above mentioned mitigation measures would reduce potential impacts associated with fire service to less than significant. Installation of a new hydrant along the north side of 1st Street would generally enhance firefighting capabilities in the area and would not create any adverse secondary effects.

Impact PS-2 Onsite development would incrementally increase demands on the Los Angeles Police Department. However, the development on the project site would not adversely affect police service due to the availability of adequate police protection and resources. Therefore, impacts related to police protection would be *less than significant*.

Onsite development may include up to 538 residential dwelling units and 743,750 square feet of non-residential space. This development would incrementally increase demand for police protection services in the site vicinity. The 538 dwelling units would bring an estimated 1,526 residents to the project site (see Appendix A, Initial Study), who would generate police protection calls. Onsite commercial development could also generate increased calls for police protection. However, the LAPD has indicated that it has sufficient resources to accommodate police protection demands associated with onsite development (Sgt. Kent, November 2009).

As identified in the *Setting*, emergency response times are approximately 2 ½ minutes in the Central Division. The project site is accessible via three main roadways, which would provide the emergency responders a variety of options to access the project site. Response times may be affected by the traffic conditions of the street network in the project site vicinity. However, onsite development would be required to be built according to emergency access code requirements which include adequate lanes for access and lighting. Therefore, impacts would be less than significant. Nevertheless, standard mitigation measures shall be implemented to further reduce potential impacts associated with onsite development.

Mitigation Measures. Although the onsite development's impacts on police services would be less than significant, the City of Los Angeles has standard mitigation requirements to further reduce potential impacts. The following mitigation shall be implemented.

PS-2 Standard LAPD Requirements. The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which

may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site if needed. Please refer to Design Out Crime Guidelines: Crime Prevention Through Environmental Design published by the Los Angeles Police Department's Crime Prevention Section (located at 150 North Los Angeles Street, Room 818, Los Angeles, California, 90012). These measures shall be approved by the Police Department prior to the issuance of building permits.

Significance after Mitigation. Although impacts would be less than significant, implementation of the above mitigation measure would further reduce impacts to police services.

Impact PS-3 Onsite development would generate students who would enroll in LAUSD schools. This could result in an exceedance of LAUSD school design capacities. However, in accordance with State law, the payment of State-mandated school impact fees is deemed adequate mitigation. Therefore, impacts to schools would be *less than significant*.

Onsite development would increase enrollment at LAUSD schools, some of which may be enrolled beyond existing capacity. Onsite development would involve up to 528 multi-family residential units, which would result in increased LAUSD school enrollment. Table 4.9-4 illustrates the estimated students generated by onsite development.

**Table 4.9-4
 Estimated Student Generation by Onsite Development**

| Use Type | Number of Dwelling Units | School Type | Student Generation Factor | Total Students Generated |
|--------------------------|--------------------------|-------------------------|---------------------------|--------------------------|
| Multi-family residential | 528 ^a | Elementary School (K-5) | 0.2042 | 108 |
| | | Middle School (6-8) | 0.0988 | 52 |
| | | High School (9-12) | 0.0995 | 53 |
| Total | | | | 213 |

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

^a This includes the 83 live/work units

As indicated in Table 4.9-4, onsite development would generate an estimated 213 new students at the LAUSD, including 108 elementary school students, 52 middle school students, and 53 high school students. These students would likely attend the LAUSD schools identified in Table 4.9-3. The increase in students could potentially create exceedances of capacity at affected LAUSD schools. However, as discussed in the *Setting*, payment of school impact fees is deemed



“full and complete mitigation” for project impacts pursuant to Senate Bill 50. Therefore, payment of these fees would reduce potential impacts to a less than significant level.

Mitigation Measures. Although school impact fees are standard requirements for developments within the City, the following standard mitigation measure is required to ensure payment of applicable fees.

PS-3 School Impact Fees. The applicant shall pay school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the project site vicinity.

Significance after Mitigation. Pursuant to State law, the collection of State-mandated school impact fees would reduce school capacity impacts to a less than significant level as these fees are presumed to provide full and complete mitigation of school facilities impacts according to the provisions of SB 50. Payment of these fees would reduce potentially significant impacts to a level of insignificance.

c. Cumulative Impacts. The cumulative impact analysis is based on projects identified by the City in Tables 3-1 and 3-2 in Section 3.0, *Environmental Setting*. Approximate cumulative development would include about 5 million square feet of non-residential development, 2,000 hotel rooms, and about 17,500 dwelling units. Impacts are considered significant if two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts (CEQA, Section 15355).

Fire Protection. Onsite development, in conjunction with the related projects, would increase the residential and employment population in the area. The increased population could increase demand for fire protection services. As indicated in the above analysis, onsite development impacts would be reduced to a level of less than significant with mitigation. Similar to the onsite development, each of the related projects would be individually subject to LAFD requirements based on fire flows, response distance, and review of hydrants and access. Therefore, the cumulative impact to fire protection services would be less than significant.

Police Services. Onsite development, in conjunction with the related projects, would increase the residential and employment population in the area. This increased population could increase the demand for police protection. Similar to the onsite development, each of the related projects would be individually subject to LAPD review, and would be required to comply with all applicable safety requirements of the LAPD and the City of Los Angeles in order to adequately address police protection service demands. Furthermore, each related project would also contribute additional tax revenue that could be used for commensurate expansion of police services and the hiring of additional police officers. Therefore, the cumulative impact to police protection services would be less than significant.

Schools. Of the 68 related projects in Table 3-1, 45 would include residential developments that could generate school-age children and could have a potential on school capacity. Table 4.9-5 illustrates the potential generation of students that would be added to LAUSD schools.

**Table 4.9-5
Estimated Student Generation by the Cumulative Projects**

| Use Type | Number of Dwelling Units | School Type | Student Generation Factor | Total Students Generated |
|---------------------------------------|--------------------------|-------------------------|---------------------------|--------------------------|
| Multi-family residential ^a | 14,417 | Elementary School (K-5) | 0.2042 | 2,944 |
| | | Middle School (6-8) | 0.0988 | 1,424 |
| | | High School (9-12) | 0.0995 | 1,434 |
| Total | | | | 5,852 |

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

a The residential developments did not include single family residential units

As indicated in Table 4.9-5, cumulative development would add an estimated 5,852 students to LAUSD schools. However, similar to onsite development, the applicants of the related commercial and residential projects would be expected to pay required developer school fees to the LAUSD (pursuant to SB 50) to help reduce impacts they may have on school services. As discussed above, payment of school impact fees provides full and complete mitigation of school facilities impacts pursuant to state law. The payment of these fees by the related projects would be mandatory and would reduce the cumulative impact upon school services to a less than significant level.

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