

# IV. Environmental Impact Analysis

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## J. Public Services

### 5. Libraries

#### 1. Introduction

This section of the Draft EIR evaluates whether new or physically altered library facilities would be required to provide library services to the Project, the construction of which could cause significant environmental impacts. The analysis considers available library capacity and whether it is sufficient to accommodate the population growth generated by the Project. The analysis is based, in part, on library standards and capacity data provided by City of Los Angeles (City) Public Library (LAPL) in correspondence dated October 11, 2017. This correspondence is included in **Appendix K** of this Draft EIR.

#### 2. Environmental Setting

##### a) Regulatory Framework

There are several plans, policies, and programs regarding Libraries at the federal, state, regional, and local levels. Described below, these include:

- City of Los Angeles General Plan Framework
- Los Angeles Public Library Branch Facilities Plan 2007
- Los Angeles Public Library Strategic Plan 2015–2020
- Central City North Community Plan

##### (1) Local

##### (a) *City of Los Angeles General Plan Framework Element*

The City's General Plan Framework (Framework Element), adopted in December 1996 and readopted in August 2001, provides general guidance regarding land use issues for the entire City and defines Citywide policies regarding land use, including infrastructure and public services. The City's objectives regarding the provision of adequate library services and facilities to meet the needs of the City's residents are set forth in Objectives 9.20 and 9.21. Objective 9.21 proposes to ensure library services for current and future residents and businesses. Under the Framework Implementation Programs, Plans and Policies Chapter, Framework Policy 13, the Department of Libraries is charged with the responsibility of updating the Library Master Plan to provide sufficient capacity to correct existing deficiencies as well as meet the needs of future population. The

implementation plans and policies set forth in the Framework Element were addressed through the 2007 LAPL Branch Facilities Plan (Facilities Plan) (discussed further below).<sup>1</sup>

(b) *Los Angeles Public Library Branch Facilities Plan 2007*

The Los Angeles Public Library Branch Facilities Plan was first adopted in 1988 and later revised in 2007 as Appendix VI of the Los Angeles Public Library Strategic Plan 2007-2010. The 1988 Branch Facilities Plan became the blueprint for the most significant change in the Los Angeles Public Library infrastructure in its history. Based on the Facilities Plan and the construction funds obtained in the subsequent bond issues, 90% of the library infrastructure was replaced in a fifteen-year period. The Facilities Plan guides the construction of branch libraries and specifies standards for the size and features of branch facilities based on the population served in each community.<sup>2</sup> Facility needs and population growth projections to the year 2030 are forecasted within the Strategic Plan. The Facilities Plan within the Strategic Plan also outlines guidelines for the expansion of City library facilities based on the location and population served in each community. Under the Facilities Plan, the service population for a branch library is determined by the size of the facility as set forth in **Table IV.J.5-1**.<sup>3</sup>

**Table IV.J.5-1**  
**LAPL Branch Facilities Site Selection Criteria**

<b>Library Type</b>	<b>Population Served</b>	<b>Size of Facility (sf)</b>
Local Branch	< 45,000	12,500
Local Branch	> 45,000	14,500
Regional Branch	Unspecified	≤ 20,000
Central Library	System-Wide	Unspecified
Level at which new Branch Library is recommended	90,000	12,500-14,500
<i>Source: Los Angeles Public Library, Building on Success: Strategic Plan, 2007–2010. Adopted December 11, 1996. As discussed below, the 2015-2020 Strategic Plan is now available. No changes to LAPL building size standards are included in the 2015-2020 Strategic Plan.</i>		

The 2007 Branch Facilities Plan is the basic document driving future development of LAPL facilities. As such, it provides guidance on the preparation of cost estimates for property acquisition, design and construction of proposed library projects, and analyses of options for obtaining funding to build new libraries.

<sup>1</sup> City of Los Angeles, Department of City Planning, City of Los Angeles General Plan Framework, <https://planning.lacity.org/cwd/framwk/chapters/09/09.htm#libraries>, Objectives 9.20 and 9.21. Accessed August 22, 2022.

<sup>2</sup> Los Angeles Public Library, Building on Success: Strategic Plan, 2007–2010. As discussed below, the 2015-2020 Strategic Plan is now available.

<sup>3</sup> Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.

*(c) LAPL Strategic Plan 2015-2020*

The Los Angeles Public Library Strategic Plan 2015–2020<sup>4</sup> (Strategic Plan) sets forth LAPL's goals and objectives focused on providing library services within existing library facilities. The goals and objectives discussed in the Strategic Plan focus on community development and program expansion in an effort to increase the number of people who use the library services, increase the number of library card holders, and increase residents' overall engagement with the library. Through Measure L, approved in March 2011, LAPL would also be able to expand its services, collections and technology. The LAPL Strategic Plan 2015-2020 is a five-year plan to detail expanded programs and services, referred to as Key Activities within the Plan, offered by LAPL.<sup>5</sup>

*(d) Central City North Community Plan*

The Land Use Element of the City's General Plan includes 35 community plans. Community plans are intended to provide an official guide for future development and propose approximate locations and dimensions for land use. The community plans establish standards and criteria for the development of housing, commercial uses, and industrial uses, as well as circulation and service systems. The community plans implement the City's General Plan Framework at the local level and consist of both text and an accompanying generalized land use map. The community plans' texts express goals, objectives, policies, and programs to address growth in the community, including those that relate to libraries required to support such growth. The community plans' maps depict the desired arrangement of land uses as well as street classifications and the locations and characteristics of public service facilities.

The 2000 Central City North Community Plan guides land uses on the Project Site and in the surrounding areas. The current plan (adopted December 15, 2000) contains the following goal, objective, policies, and programs related to libraries:

**Goal 7:** Ensure that adequate library facilities are provided for the community's residents.

**Objective 7-1:** To encourage the City's Library Department to provide adequate library service which responds to the needs of the community.

**Policy 7-1.1** Encourage flexibility in siting libraries in mixed-use projects, shopping malls, pedestrian-oriented areas, transit stations, office buildings, and similarly accessible facilities.

**Program:** Through the inclusion of this policy in the Plan text, the Plan supports these identified locations as desirable sites for new libraries and recommends that this policy be considered when the Library Department and decision-makers review and approve site for new libraries.

<sup>4</sup> Los Angeles Public Library Strategic Plan 2015–2020, June 2015, [https://www.lapl.org/sites/default/files/media/pdf/about/LAPL\\_Strategic\\_Plan\\_2015-2020.pdf](https://www.lapl.org/sites/default/files/media/pdf/about/LAPL_Strategic_Plan_2015-2020.pdf). Accessed August 22, 2022.

<sup>5</sup> Los Angeles Public Library, Los Angeles Public Library Strategic Plan 2015-2020, [https://www.lapl.org/sites/default/files/media/pdf/about/LAPL\\_Strategic\\_Plan\\_2015-2020.pdf](https://www.lapl.org/sites/default/files/media/pdf/about/LAPL_Strategic_Plan_2015-2020.pdf). Accessed August 22, 2022.

## b) Existing Conditions

### (1) Regional Facilities

The LAPL provides library services throughout the City, which includes the Central Library, eight regional branch libraries, 73 community branches and online resources.<sup>6</sup> During the 2019-2020 fiscal year, the LAPL provided library services to approximately 10.8 million visitors across the City's 470-square miles in addition to 11.4 million web visits.<sup>7</sup> The LAPL has over 7.2 million books, magazines, DVD, CD materials with 100 online databases, 759,778 e-books, e-audiobooks, e-music and e-videos and three million historic and contemporary images.<sup>8</sup> Administratively, the LAPL is divided into six geographic regions, which includes: Central Southern, Northeast, East Valley, West Valley, and Hollywood.<sup>9</sup> The Project Site is located in the LAPL's Northeast region.

The LAPL's network of libraries includes expanded and rebuilt facilities, as well as facilities at new locations. All branch libraries provide free access to computer workstations, thereby enabling patrons to access the internet and the LAPL's electronic resources, including an online catalog, subscription databases, word processing, language learning, and a large collection of historic documents and photographs. In addition, specially designed websites are provided for children, teens, and Spanish speakers.

The LAPL is a member of the Southern California Library Cooperative, an association of 39 independent city, county, and special district public libraries located in Los Angeles and Ventura counties that have agreed to cooperate in providing library service to the residents of all participating jurisdictions. The Southern California Library Cooperative provides member libraries with a resource-sharing network and a means to enhance the level and diversity of resources available to library users, while reducing duplication of effort.<sup>10</sup>

### (2) Local Facilities

According to information provided by the LAPL,<sup>11</sup> the Project Site is located within service area of several library facilities within a two-mile radius, the distance that is generally considered to encompass the service area of a library.<sup>12</sup> Three of the libraries are less than two miles, one is

<sup>6</sup> Los Angeles Public Library website, Library Locations, <https://www.lapl.org/branches>. Accessed August 22, 2022.

<sup>7</sup> Los Angeles Public Library website, Facts, <https://www.lapl.org/about-lapl/press/library-facts>. Accessed August 22, 2022.

<sup>8</sup> Los Angeles Public Library website, Facts, <https://www.lapl.org/about-lapl/press/library-facts>. Accessed August 22, 2022.

<sup>9</sup> Los Angeles Public Library, Library Directory and Branch Map, [https://www.lapl.org/sites/default/files/media/pdf/about/branch\\_map.pdf](https://www.lapl.org/sites/default/files/media/pdf/about/branch_map.pdf). Accessed August 22, 2022.

<sup>10</sup> Southern California Library Cooperative, Member Libraries, <https://socalibraries.org/about-2/libraries/>. Accessed August 22, 2022.

<sup>11</sup> Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.

<sup>12</sup> L.A. CEQA Thresholds Guide, Section K.5, p. K.5-2, <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf>. Accessed August 22, 2022.

slightly more than two miles away. **Figure IV.J-5.1, Library Location Map**, presents the location of the LAPL four libraries serving the Project Site.

The Richard J. Riordan Central Library (Central Library) serves as the headquarters for the Los Angeles Public Library at 630 West 5th Street, approximately 1.9 mile northwest of the Project Site. The Central Library is approximately 538,000 square feet in size and carries 2.6 million volumes in collection and annual circulation of 1.2 million with a staff of 390 full-time employees. Additionally, library staff answer over two million reference questions and present 2,100 programs that attract nearly 46,000 people each year. Furthermore, nearly 600,000 hours of computer access are provided to Central Library users annually. The Central Library is not only a resource for the local population, it serves the entire City and County of Los Angeles as well. The estimated current service population (based on the 2010 Census data) is approximately 3,792,662 persons within the City and 9,818,605 persons within the County of Los Angeles. The Central Library exceeds the recommended building size standard of up to 20,000 square feet for a Regional Branch. However, the 2007 Branch Facilities Plan also recommends the addition of a second branch for communities with populations above 90,000 persons.<sup>13</sup> As described below, there are three other branch libraries approximately two-miles or less from the Project Site.

The closest local library branch is the Little Tokyo Branch located at 203 South Los Angeles Street, approximately 1.5 miles northwest of the Project Site. The Little Tokyo Branch Library is approximately 12,500 square feet and carries 66,634 volumes in collection and annual circulation of 143,317 with a staff of 10.0 full-time employees. Based on the 2010 Census data, the service population of the Little Tokyo Branch Library is approximately 45,796 persons.<sup>14</sup> As a result, the Little Tokyo Branch Library currently does not meet the 2007 Branch Facilities Plan's recommended building size standards (14,500 square feet for a service population over 45,000 persons as identified in **Table IV.J-5.1**).

The Ben Franklin Branch Library is located at 2200 E. First Street, approximately 1.7 northeast of the Project Site. The branch is approximately 9,656 square feet in size and carries 35,545 volumes in collection and an annual circulation of 126,012 with a staff of 11 full-time employees. Based on the 2010 Census data, the service population of the Ben Franklin Branch Library is approximately 40,319 persons.<sup>15</sup> As a result, the Ben Franklin Branch Library currently does not meet the 2007 Branch Facilities Plan's recommended building size standards (12,500 square feet for a service population less than 45,000 persons).<sup>16</sup>

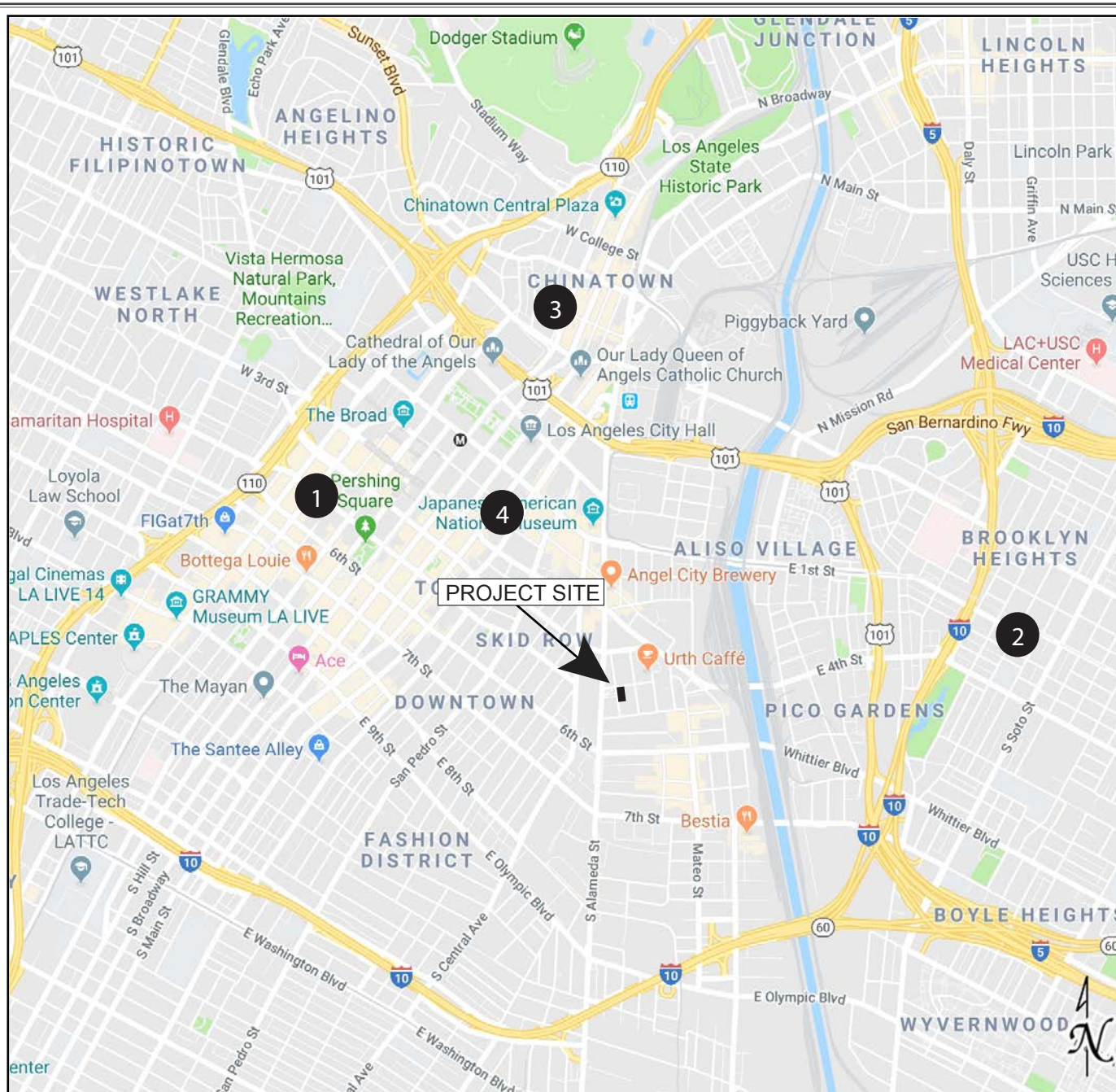
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<sup>13</sup> Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.

<sup>14</sup> Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.

<sup>15</sup> Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.

<sup>16</sup> Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.



- 1 Central Library:  
630 W. 5th Street
- 2 Benjamin Franklin Branch Library:  
2200 E. 1st Street
- 3 Chinatown Branch Library:  
639 N. Hill Street
- 4 Little Tokyo Branch Library:  
203 S. Los Angeles Street

Source: Google Maps, April 2019.

Figure IV.J.5-1  
Library Location Map

The Chinatown Branch Library is located at 639 North Hill Street and is approximately 2.2 miles north miles of the Project Site. The Chinatown Branch Library is approximately 14,500 square feet in size and carries 74,709 volumes in collection and circulation of 238,872 with a staff of 13.5 full-time employees. Based on the 2010 Census data, the service population of the Chinatown Branch Library is approximately 11,225 persons.<sup>17</sup> The Chinatown Branch Library currently meets the 2007 Branch Facilities Plan's recommended building size standards (i.e., 12,500 square feet for a service population below 45,000 persons). However, it should be noted that the circulation of 238,872, is due to nearby school locations which greatly increase its use well beyond the 11,225 population of the community that it serves.<sup>18</sup>

All four of the libraries offer special facilities and services that include free public wireless internet, wireless printing, computer reservations, meeting room rentals, and zoom text computers for the visually impaired. The hours of operation for the Central Library are: 10 am – 8 pm Mondays-Thursdays, 9:30 am – 5:30 pm Fridays and Saturdays and 1 pm – 5 pm on Sundays. The hours of operation for all three local branch libraries are: 10 am - 8 pm on Mondays and Wednesdays; 12 pm - 8 pm on Tuesdays and Thursdays; and 9:30 am – 5:30 pm on Fridays and Saturdays. The branches are closed on Sundays. The LAPL's web-based resources are available 24 hours a day, seven days a week. At this time, there are no planned improvements to add capacity through expansion or develop new libraries in the Project area.<sup>19</sup>

### 3. Project Impacts

#### a) Thresholds of Significance

In accordance with the Appendix G of the *State CEQA Guidelines*, the Project would have a significant impact related to government facilities, including libraries, if it would:

***Threshold (a): Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 libraries.***

For this analysis, the Appendix G Thresholds are relied upon. The analysis utilizes factors and considerations identified in the 2006 L.A. CEQA Thresholds Guide, as appropriate, to assist in answering the Appendix G Threshold questions.

<sup>17</sup> Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.

<sup>18</sup> Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.

<sup>19</sup> Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.



The *L.A. CEQA Thresholds Guide* identifies the following criteria to evaluate library impacts:

### (1) Population Growth

- *The net population increase resulting from the proposed project.*

### (2) Library Services

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

## **b) Methodology**

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

## **c) Project Design Features**

Construction and operation of the Project would be implemented in accordance with applicable regulatory and code requirements related to libraries. No specific Project Design Features are proposed with regard to libraries.

## **d) Analysis of Project Impacts**

As compared to the Project, the Flexibility Option would change the use of the second floor from residential to commercial, and would not otherwise change the Project's land uses or size. The overall commercial square footage provided would be increased by 17,765 square feet to 64,313 square feet and, in turn, there would be a reduction in the number of live/work units from 220 to 200 units and a decrease in the number of bicycle spaces from 180 to 179. The overall building parameters would remain unchanged and the design, configuration, and operation of the Flexibility Option would be comparable to the Project. In the analysis of Project impacts presented below, where similarity in land uses, operational characteristics and project design features between the Project and the Flexibility Option would be essentially the same, the conclusions regarding the impact analysis and impact significance determination presented below for the Project would be the same under the Flexibility Option. For those thresholds where numerical differences exist because of the differences in project parameters between the Project and Flexibility Option, the analysis is presented separately.



**Threshold (a):** *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 libraries?*

Numerical differences exist for these thresholds because of the differences in project parameters between the Project and Flexibility Option, therefore these analyses are presented separately.

## (1) Impact Analysis

### (a) Project

#### (i) Construction

Construction of the Project would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in the Los Angeles and Southern California area, and the operation of the market for construction workers, the likelihood that construction workers would relocate their households as a consequence of working on the Project is negligible. The construction industry differs from most other sectors in several ways:

- There is no regular place of work. Construction workers regularly commute to job sites that change many times over the course of a year. Their sometimes-lengthy daily commutes are facilitated by the off-peak starting and ending times of the typical construction workday.
- Many construction workers are highly specialized (e.g., crane operators, steel workers, masons) and move from job site to job site as dictated by the demand for their skills; and
- The work requirements of most construction projects are highly specialized. Workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process.

Therefore, the construction workers associated with the Project would not result in a notable increase in the residential population of the Project area, or a corresponding permanent demand for library services in the vicinity of the Project Site.

In addition, it is unlikely that construction workers would visit Project area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries

open for service. Therefore, any increase in usage of libraries by construction workers is anticipated to be negligible.

As such, Project construction would not cause local libraries to exceed its capacities to adequately serve the existing residential population based on target service populations or as defined by the LAPL. Project construction would not substantially increase the demand for library services for which current demand exceeds the ability of the facility to adequately serve the population. **Therefore, Project construction would not result in the need for new or physically altered libraries, the construction of which would cause significant environmental impacts. Impacts on library facilities during Project construction would be less than significant.**

(ii) *Operation*

As described above, based on information provided by the LAPL, the Project Site is located within the service areas of the Central Library, Little Tokyo Branch Library, Chinatown Branch Library and Ben Franklin Branch Library.<sup>20</sup> These four libraries are located within a less than two-mile radius of the Project Site, the distance that is generally considered to comprise the service area of a library.<sup>21</sup> Therefore, these libraries could also provide library service to the Project Site.

The Project Site currently does not include any housing; thus, there are no residents on the Project Site that use the four identified libraries. The Project would involve the demolition of the existing warehouses and surface parking lot, and the construction of a mixed-use building including approximately 220 live/work units, approximately 46,548 square feet of commercial uses, 22,725 square feet of open space for residents and associated parking facilities. As addressed in **Section IV.I, Population and Housing**, of this Draft EIR, the Project would create 195 new market-rate housing units and 25 new Very Low Income housing units, which, based on the City's average household size of 2.25 persons per multi-family residential unit and 3.14 persons per affordable housing – family unit, would generate an estimated 518 residents.<sup>22</sup> The Project's population would increase the demand for library services compared to existing conditions.

The Project's commercial uses, as identified in **Section IV.I, Population and Housing**, of this Draft EIR, in **Table IV.I-2, Project Generation of Population, Housing, and Employment**, would generate a total of 120 new employees. It is anticipated that this new use would include permanent and part-time positions that are typically filled by persons already residing in the vicinity of the workplace, and who already generate a demand for libraries in the vicinity of the Project Site. Thus, any indirect or direct new demand for library services generated by employees of the commercial uses would already be taken into account in the library services provision.

<sup>20</sup> Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.

<sup>21</sup> L.A. CEQA Thresholds Guide, Section K.5, pg. K.5-2, <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf>. Accessed August 22, 2022.

<sup>22</sup> City of Los Angeles, Department of Transportation and Department of City Planning, City of Los Angeles VMT User Guide, Version 1.3, Table 1: Land Use and Trip Generation Base Assumptions, pages 10-11. [https://ladot.lacity.org/sites/default/files/documents/vmt\\_calculator\\_documentation-2020.05.18.pdf](https://ladot.lacity.org/sites/default/files/documents/vmt_calculator_documentation-2020.05.18.pdf). Accessed August 22, 2022.

As described above, according to the LAPL, the Central Library's current service population is 3,792,662 persons. With the addition of the Project's 518 estimated new residents, the service population of the Central Library would increase to 3,793,180 persons. As discussed above, the Central Library is not only a resource for the local population, but it is also a destination for regional, domestic, and international patrons and serves the entire LAPL service area and provides resources that go beyond those provided through local and regional branch libraries. The LAPL Branch Facilities Plan does not identify population served or facility size criteria for this facility as it serves not just the downtown area but the entire City and County as a unique facility with resources that go beyond what is provided through local and regional branch libraries.

Currently, of the three local branches, only the Chinatown Branch Library meets the recommended building size standards of 12,500 square feet for a service population of less than 45,000 persons. The current population within the service boundary is 11,225 persons, or 33,775 persons below the level at which a new library might be considered. The Project's new 518 residents would constitute approximately 1.5 percent of the 33,775 persons, the allowable population without triggering the LAPL's threshold for a new branch library. As such, the library's existing service level would be maintained without an additional library or alterations to the existing library. Furthermore, the use of the Chinatown Branch Library by Project residents is anticipated to be minimal, due to its distance from the Project Site and the likely scenario of Project residents to use the nearest library, the Little Tokyo Branch Library, as well as the Central Library. Therefore, the library would continue to meet the recommended building size standards.

The Little Tokyo Branch Library, which is closest to the Project Site, and Ben Franklin Branch Library currently do not meet the recommended building size standards of 14,500 square feet for a service population of more than 45,000 persons nor 12,500 square feet for a service population of less than 45,000 persons. With the addition of the Project's 518 estimated new residents, the service population for the 12,500 square foot Little Tokyo Branch Library would increase from 45,796 persons to 46,314 persons. The current population within the service boundary is 45,796 persons, or 796 persons above the level at which a new library might be considered. LAPL has stated that there are no planned improvements to add capacity to the Little Tokyo Branch Library through expansion, and there are no plans for the development of any other new libraries to serve this community. As such, the Little Tokyo Branch Library would continue its operations without meeting the recommended building size standards with or without the Project.

With the addition of the Project's 518 new residents the 9,656-square-foot Ben Franklin Branch Library service population would increase from 40,319 persons to 40,837 persons. The current population within the service boundary is 40,319 persons, or 319 persons above the level at which a new library might be considered. Regardless, the library's existing service level would be maintained without an additional library or alterations to the existing library. Therefore, combined with the LAPL standards for new development and the fees to help to pay for any improvements that the LAPL may do in the future, impacts to library facilities would be less than significant. **The Project would not result in the need for new or altered facilities, the construction of which would cause significant environmental impacts. As such, impacts on library facilities during operation of the Project would be less than significant.**

(b) *Flexibility Option*

(i) *Construction*

Characteristics of construction workers and library usage under the Flexibility Option would be the same as the Project.

**Construction of the Flexibility Option would not substantially increase the demand for library services for which current demand exceeds the ability of the facility to adequately serve the population. As such, construction of the Flexibility Option would not result in the need for new or physically altered libraries, the construction of which would cause significant environmental impacts. Flexibility Option impacts on library facilities during construction would be less than significant.**

(ii) *Operation*

The commercial uses, as identified in **Section IV.I, Population and Housing**, of this Draft EIR, in **Table IV.I-4, Flexibility Option Generation of Population, Housing, and Employment**, would generate a total of 145 new employees. It is reasonable to expect that some of the new employees would be drawn from the local labor force within the Central City North Community Plan area and surrounding communities and therefore, may already be residents within the LAPL service area and not new to the entire system. Moreover, employees at the Project Site would be more likely to use libraries near their homes than near their place of work. Additionally, employees at the Project Site would have internet access, which provides information and research capacities and reduces the demand at physical library locations.

As described above, according to the LAPL, the Central Library's current service population is 3,792,662 persons. With the addition of the Flexibility Option's 470 estimated new residents, the service population of the Central Library would increase to 3,793,132 persons. As discussed above, the Central Library is not only a resource for the local population, but it is also a destination for regional, domestic, and international patrons and serves the entire LAPL service area and provides resources that go beyond those provided through local and regional branch libraries. The LAPL Branch Facilities Plan does not identify population served or facility size criteria for this facility as it serves not just the downtown area but the entire City and County as a unique facility with resources that go beyond what is provided through local and regional branch libraries.

Currently, of the three local branches, only the Chinatown Branch Library meets the recommended building size standards of 12,500 square feet for a service population of less than 45,000 persons. The current population within the service boundary is 11,225 persons, or 33,775 persons below the level at which a new library might be considered. The Flexibility Option's 470 estimated new residents would constitute approximately 1.4 percent of the 33,775 persons, the allowable population without triggering the LAPL's threshold for a new branch library. As such, the library's existing service level would be maintained without an additional library or alterations to the existing library. Furthermore, the use of the Chinatown Branch Library by Flexibility Option residents is anticipated to be minimal, due to its distance from the Project Site and the likely scenario of Flexibility Option residents to use the nearest library, the Little Tokyo Branch Library,

as well as the Central Library. Therefore, the library would continue to meet the recommended building size standards.

Similar to the Project, the Flexibility Option's residential units would be equipped to receive individual internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations.<sup>23,24,25</sup> and the Flexibility Option's revenue to the General Fund would help offset the Project-related increase in demand for library services. As such, the Flexibility Option would not conflict with or impede implementation of the applicable policies and goals related to libraries in the Framework Element or Community Plan.

Similar to the Project, the Flexibility Option's addition of 470 new residents to the area would not generate a substantial increase in demand for library facilities or services that would require new or physically altered library facilities in order to maintain acceptable service ratios, or increase the demand for library services for which current demand exceeds the ability of the facility to adequately serve the population. Moreover, if all new residents were to use one of the three above-identified libraries, none of the libraries would not exceed the recommended 90,000-person preferred limit. The Flexibility Option Applicant would pay a \$200 per capita fee to LAPL. These funds would be used for staff, books, computers, and other library materials. Fees would be paid by the Project Applicant, as applicable, as a Condition of Approval. Essentially, the provision of library services is the responsibility of local government, which is typically financed through the City general funds. Regardless, the library's existing service level would be maintained without an additional library or alterations to the existing library. Therefore, combined with the LAPL standards for new development and the fees to help to pay for any improvements that the LAPL may do in the future impacts to library facilities would be less than significant. **Therefore, the Flexibility Option would not result in the need for new or altered facilities, the construction of which would cause significant environmental impacts. As such, impacts on library facilities during operation of the Flexibility Option would be less than significant.**

## (2) Mitigation Measures

Project-level impacts for the Project and the Flexibility Option, with regard to library facilities, would be less than significant; no mitigation measures are required.

## (3) Level of Significance After Mitigation

Project-level impacts for the Project and the Flexibility Option, with regard to library facilities, would be less than significant without mitigation.

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<sup>23</sup> National Endowment for the Arts, "To Read or Not to Read," Research Report 47, November 2007. See page 10: "Literacy reading declined significantly in a period of rising internet use.", <https://www.arts.gov/sites/default/files/ToRead.pdf>. Accessed August 22, 2022.

<sup>24</sup> Denise A. Troll, Distinguished Fellow, Digital Library Federation, "How and Why are Libraries Changing?," January 9, 2001, <https://old.diglib.org/use/whitepaper.htm>. Accessed August 22, 2022.

<sup>25</sup> Calro Tenopir, "Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies," August 2003, <https://www.clir.org/pubs/reports/pub120/>. Accessed August 22, 2022.

## 4. Cumulative Impacts

Numerical differences exist regarding the impact analysis and impact significance determination presented below because of the differences in project parameters between the Project and Flexibility Option, therefore these analyses are presented separately.

### a) Impact Analysis

#### (1) Project

As identified in **Section III, Environmental Setting**, of this Draft EIR, there are 17 Related Projects located in the Project vicinity. Cumulative growth in the Project vicinity includes recently completed, approved, under construction, proposed, or reasonably foreseeable projects within the vicinity of the Project that could produce a related or cumulative impact on the local environment when considered in conjunction with the Project. It is conservatively assumed that all 17 Related Projects are built as currently proposed. As such, these Related Projects would have the potential to increase the need for library services. The residential population of a library's service area is the primary metric used by the LAPL for assessing the adequacy of library services and planning for future growth. The LAPL has not established any facilities criteria based on employment in a library's service area. Employees generated by the non-residential Related Projects would be more likely to use library facilities near their places of residence, as opposed to patronizing the Central Library, Chinatown, Little Tokyo or Ben Franklin branch libraries, because lunch break times are typically not long enough (30 to 60 minutes) for employees to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that employees would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of libraries by employees is anticipated to be negligible. **Therefore, the Project and non-residential Related Projects would not substantially contribute to a significant cumulative demand for library services.**

As presented in **Table IV.I-6, Total Cumulative Development (Project) (Section IV.I, Population and Housing** of this Draft EIR), the Related Projects and the Project would generate approximately 11,111 residents, a conservative estimate that assumes all residents would be new to the Project area. The geographic scope for the cumulative impact analysis is the extent of the Related Projects that would be served by the four branches serving the Project Site. Based on the location of the Related Projects they may be located within the service boundary of other local libraries. Moreover, one of the libraries serving the Project Site is the Central Library, the headquarters of the LAPL, which has an official service population of the entire City.

Similar to the Project, the related residential projects, which would generate 10,593 residents, would be subject to the standards to determine demand for library facilities used by the City. There are no currently planned improvements to add capacity through expansion to existing libraries

and no plans for the development of any other new libraries to serve the Project community.<sup>26</sup> However, similar to the Project, each Related Project, and other future development in the Central City North Community Plan area would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, etc.) that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the Project area, as deemed appropriate. These revenues to the General Fund would help offset the increase in demand for library services as a result of the Project and the Related Projects. However, similar to the Project, each Related Project, and other future development in the Central City North Community Plan area would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, etc.) that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the Project area, as deemed appropriate. These revenues to the General Fund would help offset the increase in demand for library services as a result of the Project and the Related Projects. If LAPL determines that new facilities are necessary at some point in the future, it is reasonably anticipated that such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and one acre in size, and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under *State CEQA Guidelines* Section 15301 or 15332 and would not be expected to result in significant impacts.

Furthermore, with the shift in technology from books to computers, the demand for library facilities is changing. As stated above, members of LAPL have access to thousands of podcasts, audiobooks, media publications, and instructional content online and via smartphone applications made available to library patrons. The availability of such resources reduces the demand for physical library space. Recognizing these facts, the Los Angeles Public Library Strategic Plan 2015-2020 places emphasis on the employment of new technology for meeting future needs and includes objectives for increasing its digital collections, e-mail circulation and use of mobile apps.<sup>27</sup> This has the result of allowing the LAPL to meet increased population demand aside from the provision of new physical facilities. Notwithstanding, the LAPL recommends a per capita fee of \$200 to be used for staff, books, computers, and other library materials. Fees would be paid by the Project Applicant, as applicable, as a condition of Project approval. **Based on the above, cumulative impacts to library services would be less than significant.**

## (2) Flexibility Option

As identified in **Section III, Environmental Setting**, of this Draft EIR, there are 17 Related Projects located in the Project vicinity. Cumulative growth in the Project vicinity includes approved, under construction, proposed, or reasonably foreseeable projects within the vicinity of the Project that could produce a related or cumulative impact on the local environment when considered in conjunction with the Project. It is conservatively assumed that all 17 Related Projects are built as currently proposed. As such, these Related Projects would have the potential

<sup>26</sup> Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.

<sup>27</sup> Los Angeles Public Library, Building on Success: Strategic Plan, 2007–2010: notably Objectives 2-1, 5-2, 5-4, 6-2 and 6-3, [https://www.lapl.org/sites/default/files/media/pdf/about/Strategic\\_Plan.pdf](https://www.lapl.org/sites/default/files/media/pdf/about/Strategic_Plan.pdf). Accessed August 22, 2022.



to increase the need for library services. As previously discussed, the residential population of a library's service area is the primary metric used by the LAPL for assessing the adequacy of library services and planning for future growth. Employees generated by the non-residential Related Projects would be more likely to use library facilities near their places of residence, as opposed to patronizing the Central Library, Chinatown, Little Tokyo or Ben Franklin branch libraries, because lunch break times are typically not long enough (30 to 60 minutes) for employees to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that employees would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of libraries by employees is anticipated to be negligible. **Therefore, the non-residential Related Projects would not substantially contribute to the Flexibility Option's cumulative demand for library services.**

As presented in **Table IV.I-8, Total Cumulative Development (Flexibility Option) (Section IV.I, Population and Housing**, of this Draft EIR), the Related Projects and the Flexibility Option would generate approximately 11,063 residents, a conservative estimate which assumes that all residents would be new to the Project area. Based on the location of the Related Projects they may be located within the service boundary of other local libraries. Moreover, one of the libraries serving the Project Site is the Central Library, the headquarters of the LAPL, which has an official service population of the entire City.

Similar to the Flexibility Option, the related residential projects, which would generate 10,593 residents, would be subject to the standards to determine demand for library facilities used by the City. There are no currently planned improvements to add capacity through expansion to existing libraries and no plans for the development of any other new libraries to serve the Project community.<sup>28</sup> However, similar to the Flexibility Option, each Related Project, and other future development in the Central City North Community Plan area would generate revenues to the City's General Fund (in the form of property taxes, sales tax, business tax, etc.) that could be applied toward the provision of new library facilities and related staffing for any one of the libraries serving the area, as deemed appropriate. These revenues to the General Fund would help offset the increase in demand for library services as a result of the Flexibility Option and the Related Projects. If LAPL determines that new facilities are necessary at some point in the future, it is reasonably anticipated that such facilities (1) would occur where allowed under the designated land use, (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and one acre in size, and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under *State CEQA Guidelines* Section 15301 or 15332 and would not be expected to result in significant impacts.

Furthermore, with the shift in technology from books to computers, the demand for library facilities is changing. As stated above, members of LAPL have access to thousands of podcasts, audiobooks, media publications, and instructional content online and via smartphone applications made available to library patrons. The availability of such resources reduces the demand for physical library space. Recognizing these facts, the Los Angeles Public Library Strategic Plan

<sup>28</sup> Letter correspondence with Tom Jung, Management Analyst II, LAPL, October 2017, **Appendix K** of this Draft EIR.

2015-2020 places emphasis on the employment of new technology for meeting future needs and includes objectives for increasing its digital collections, e-mail circulation and use of mobile apps.<sup>29</sup> This has the result of allowing the LAPL to meet increased population demand aside from the provision of new physical facilities. Notwithstanding, the LAPL recommends a per capita fee of \$200 to be used for staff, books, computers, and other library materials. Fees would be paid by the Project Applicant, as applicable, as a condition of Project approval. Based on the above, **cumulative impacts to library services would be less than significant.**

## **b) Mitigation Measures**

Cumulative impacts related to libraries for both the Project and Flexibility Option would be less than significant; no mitigation measures are required.

## **c) Level of Significance After Mitigation**

Cumulative impacts related to libraries for both the Project and Flexibility Option were determined to be less than significant without mitigation.

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<sup>29</sup> Los Angeles Public Library, Building on Success: Strategic Plan, 2007–2010: notably Objectives 2-1, 5-2, 5-4, 6-2 and 6-3, [https://www.lapl.org/sites/default/files/media/pdf/about/Strategic\\_Plan.pdf](https://www.lapl.org/sites/default/files/media/pdf/about/Strategic_Plan.pdf). Accessed August 22, 2022.