4.11 Public Services

This section addresses impacts associated with public services, including fire protection (Section 4.11.1), police protection (Section 4.11.2), schools (Section 4.11.3), and libraries (Section 4.11.4). These sections each describe the approach and methodology for the individual topics being addressed, based upon Appendix G, Environmental Checklist Form, of the CEQA Guidelines. The reader is referred to Section 4.12, *Recreation*, for the discussion of impacts to parks and recreational facilities.

4.11.1 Fire Protection

This section evaluated whether new or physically altered fire facilities would be required to provide fire protection services to the proposed project, the construction of which could cause significant environmental impacts. The analysis includes a description of the existing fire protection services in the vicinity of the project site. The analysis uses the following metrics from the City of Los Angeles Fire Department (LAFD) to assess potential demands on fire protection services and whether increased demands would create the need for new or expanded facilities: fire flow requirements, emergency access, and the ability of the LAFD to provide adequate fire protection services based on current facilities, equipment, and staffing levels. This analysis is based in part, on information available of the LAFD website, inter-departmental correspondence from LAFD to Department of City Planning (LAFD 2022a and 2022b; see Appendix H), and the Service Advisory Reports (SARs) and Information of Fire Flow Availability forms prepared for the project site by the City of Los Angeles Department of Water and Power (LADWP; see Appendix J).

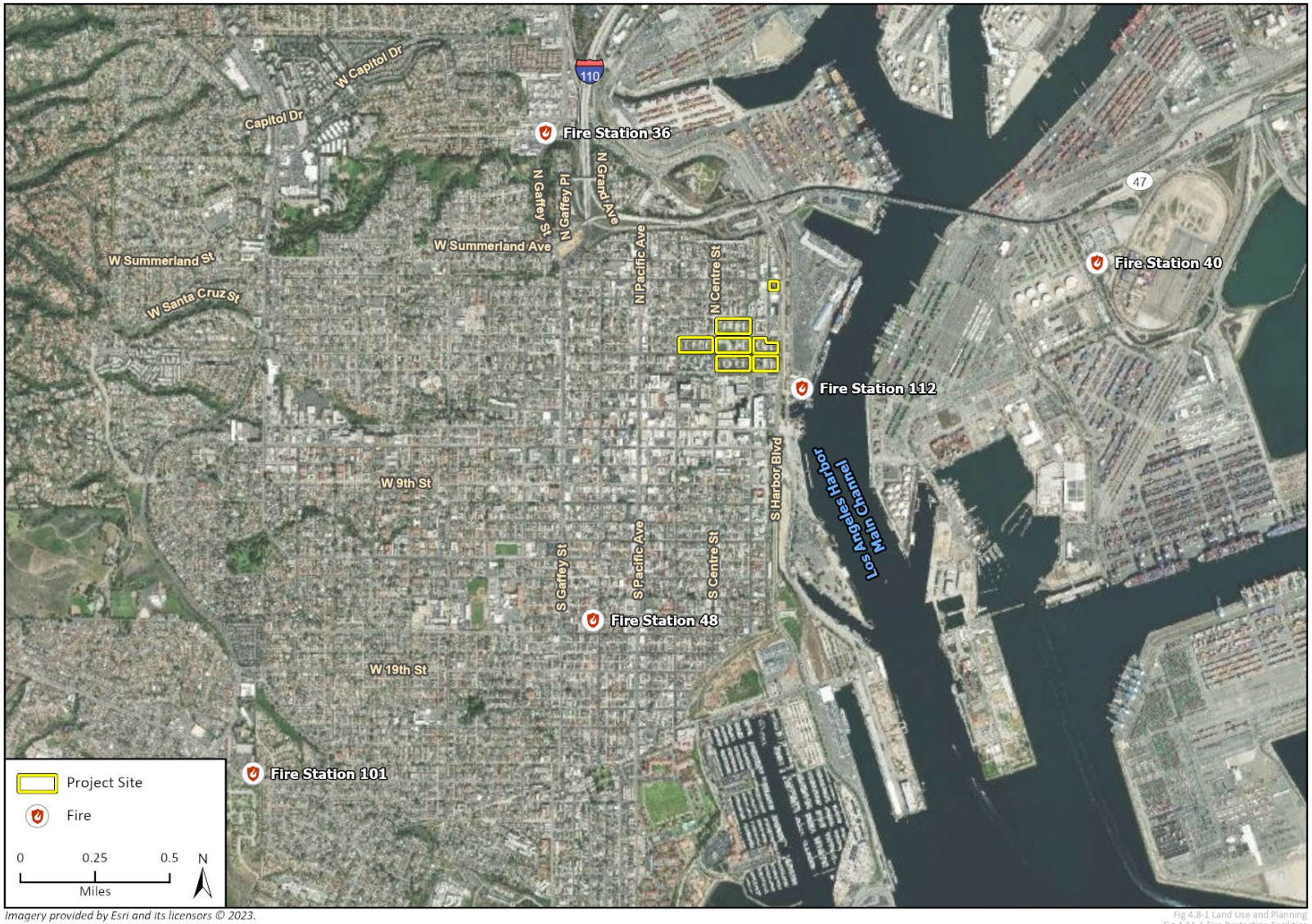
4.11.1.1 Environmental Setting

a. Fire Protection Services and Facilities

LAFD serves as the City's life safety agency with approximately 3,435 uniformed fire personnel, providing fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community services. There are 106 neighborhood fire stations strategically located across the LAFD's 469-square-mile jurisdiction. In addition, the LAFD is supported by 1,018 firefighters and 381 technical and administrative personnel (LAFD 2023).

As shown in Figure 4.11-1, there are three LAFD fire stations located within a 2-mile radius of the project site and two stations outside the 2-mile radius. The closest station to the project site is Fire Station No. 112, which is the designated "first in" station for the project site, located approximately 0.5 mile to the southeast of the project site. As shown in Table 4.11-1, Fire Station No. 112 consists of an engine, paramedic rescue, a large boat, an emergency medical services (EMS) supervisor, and a staff of 14. Secondary fire stations that could serve the project site include Fire Station No. 36 and Fire Station No. 48, located approximately 1.2 miles northwest and 1.4 miles southwest of the project site, respectively. The LAFD also identified two additional fire stations beyond a 2-mile radius of the project site that could serve the project site: Fire Station No. 40 and Fire Station No. 101. Table 4.11-1 lists the fire stations that could serve the project site and includes details regarding the distance to the project site, services and equipment available, and staffing.

Figure 4.11-1 Fire Department Facilities in the Project Area



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Additional data provided by Los Angeles County, 2022.

Fig 4.8-1 Land Use and Planning
Fig 4.11-1 Fire Protection Facilities

Table 4.11-1 LAFD Stations Serving the Project Site

Fire Station	Distance from Project Site (mile)	Services and Equipment	Staffing
No. 112	0.5	Engine, Paramedic Rescue, Large Boat, Emergency Medical Services (EMS) Supervisor	14
No. 36	1.2	Assessment Engine, Paramedic Rescue	6
No. 48	1.4	Task Force, Advanced Life Support (ALS) Engine and Basic Life Support (BLS) Truck, Emergency Medical Technician (EMT) Rescue, Hazardous Materials Squad	12
No. 40	2.8	Assessment Engine	4
No. 101	3.4	Engine, Paramedic Rescue	6

Source: LAFD 2022b

The average response times[1] for citywide LAFD events and response times for the fire stations serving the project area are shown in Table 4.11-2. LAFD has not established response time standards for emergency response, nor adopted the National Fire Protection Associated (NFPA) standard of 5 minutes for emergency medical services response and 5 minutes 20 seconds for fire suppression response (NFPA 2020).

Table 4.11-2 LAFD Response and Incident Data (2022)

	Average Response Times (minutes: seconds)		
Fire Station	EMS	Non-EMS	Structure Fires
Citywide	7:16	6:58	5:25
No. 36	7:07	6:43	5:48
No. 40	8:34	7:43	--
No. 48	6:52	5:54	4:53
No. 101	6:54	6:19	5:42
No. 112	6:46	6:13	4:54

EMS = emergency medical service

Source: LAFD 2022c

Roadway congestion, intersection level of service, weather conditions, and construction traffic along a response route can affect response time. Generally, multi-lane arterial roadways, such as Harbor Boulevard, allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of a path for an emergency vehicle. Additionally, the LAFD, in collaboration with the Los Angeles Department of Transportation (LADOT), developed a Fire Preemption System, a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response (LADOT 2016). The city has over 205 miles of major arterials equipped with Fire Preemption System (LAFD 2008).

Although response times can be considered to assess the adequacy of fire protection and emergency medical services, it is one factor among several that LAFD utilizes in considering its ability to respond

[1] Response time is alarm handling time, turnout time and travel time, and initiating action/intervention time for emergency medical service and fire suppression incidents.

to fires and life and health safety emergencies, including required fire flow, response distance from existing fire stations, and the LAFD's judgment for needs in an area. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment, and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. In conformance with the California Constitution Article XIII, Section 35(a)(2) the City has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection and emergency medical services, and the need for additional fire protection and emergency medical services is not an environmental impact that CEQA requires a project proponent to mitigate.

b. Emergency Access

Major streets providing access to the project site include 1st Street and 5th Street in the east-west direction and Gaffey Street, Pacific Avenue, and Harbor Boulevard in the north-south direction. In addition, local access to the project site is provided by local streets and avenues including: Centre Street, Grand Avenue, Beacon Street, Mesa Street, Palos Verdes Street, 3rd Street, 2nd Street, Santa Cruz Street, and O'Farrell Street (Fehr & Peers 2023; Appendix I). In addition, Harbor Boulevard and South Pacific Avenue are designated evacuation routes near the project site (City of Los Angeles 2022; County of Los Angeles 2022). Other nearby designated evacuation routes include State Route 47 and State Route 110.

c. Fire Water Infrastructure

In addition to providing domestic water service, the Los Angeles Department of Water and Power (LADWP) also provides water for firefighting services in accordance with the City's Fire Code (Los Angeles Municipal Code [LAMC] Chapter V, Article 7). Water service is currently provided to the project site via LADWP water lines within adjacent streets. Existing infrastructure ranges from six- to eight-inch main lines within surrounding public streets. There are four water mains serving the OSP Specific Plan Site, including an 8-inch water main in Santa Cruz Street, 6-inch water main in Mesa Street, 8-inch water main in 3rd Street, and 12-inch water main in Harbor Boulevard (KPFF Consulting Engineers [KPFF] 2022). The 327 Harbor Site is adjacent to existing 12-inch water mains in O'Farrell Street and Harbor Boulevard (LADWP 2022c).There are four fire hydrants serving the OSP Specific Plan Site: one at the southwest corner of Santa Cruz Street and Beacon Street, one at the southwest corner of 1st Street and Centre Street, one at the southwest corner of 2nd Street and Harbor Boulevard, and one 250 feet east of the 2nd Street and Centre Street intersection. There are also four fire hydrants serving the 327 Harbor Site: these include hydrants located at the southwest corner of O'Farrell Street and Beacon Street, the southwest corner of O'Farrell Street and Harbor Boulevard, 200 feet north of the O'Farrell and Harbor Boulevard intersection on O'Farrell Street, and at the east side of the O'Farrell Street and Harbor Boulevard intersection. .

d. Fire Hazard Areas

Wildfire risks and impacts are addressed in Section 4.16.5, *Wildfire*. The project site is not located in or near a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2022). The project site is located approximately 1.7 miles east of the nearest VHFHSZ at the edge of Rancho Palos Verdes and is separated from this area by intervening development, roadways, and infrastructure. Due to the project site's urban surroundings and distance to the nearest VHFHSZ, the project site is not subject to substantial risk of wildfire.

4.11.1.2 Regulatory Setting

a. Federal Laws and Regulations

Occupational Safety and Health Act

The Federal Occupational Safety and Health Administrations (OSHA) as well as California OSHA (Cal/OSHA) enforce the provisions of the federal and State Occupational Safety and Health Acts, respectively, which collectively require safety and health regulations for construction under Part 1926 of Title 29 Code of Federal Regulations. The fire-related requirements of the Federal Occupational Safety and Health Act are specifically contained in Subpart F, Fire Protection and Prevention, of Part 1926. Examples of general requirements related to fire protection and prevention include maintaining fire suppression equipment specific to construction on the project site; providing a temporary or permanent water supply of sufficient volume, duration, and pressure; properly operating the on-site fire-fighting equipment; and keeping storage sites free from accumulation of unnecessary combustible materials.

Federal Emergency Management Act

The Federal Emergency Management Agency (FEMA) was established in 1979 via executive order and is an independent agency of the federal government. In March 2003, FEMA became part of the U.S. Department of Homeland Security with the mission to lead the effort in preparing the nation for all hazards and effectively manage federal response and recovery efforts following any national incident. FEMA also initiates proactive mitigation activities, trains first responders, and manages the National Flood Insurance Program and the U.S. Fire Administration.

Disaster Mitigation Act of 2000

Disaster Mitigation Act (42 United States Code [U.S.C.] Section 5121) provides the legal basis for FEMA mitigation planning requirements for State, local, and Indian Tribal governments as a condition of mitigation grant assistance. It amends the Robert T. Stafford Disaster Relief Act of 1988 (42 U.S.C. Section 5121-5207) by repealing the previous mitigation planning provisions and replacing them with a new set of requirements that emphasize the need and creates incentives for State, tribal, and local agencies to closely coordinate mitigation planning and implementation efforts. This Act reinforces the importance of pre-disaster infrastructure mitigation planning to reduce disaster losses nationwide and the streamlining of the administration of federal disaster relief and programs to promote mitigation activities. Some of the major provisions of this Act include:

- Funding pre-disaster mitigation activities
- Developing experimental multi-hazard maps to better understand risk
- Establishing state and local government infrastructure mitigation planning requirements
- Defining how states can assume more responsibility in managing the Hazard Mitigation Grant Program (HMGP)
- Adjusting ways in which management costs for projects are funded

The mitigation planning provisions outlined in Section 322 of this Act establish performance-based standards for mitigation plans and require states to have a public assistance program (Advance Infrastructure Mitigation) to develop county government plans. The consequence for counties that fail to develop an infrastructure mitigation plan is the chance of a reduced federal share of damage

assistance from 75 percent to 25 percent if the damaged facility has been damaged on more than one occasion in the preceding 10-year period by the same type of event.

b. State Laws and Regulations

California Building Code and California Fire Code

The California Building Code (California Code of Regulations [CCR], Title 24, Part 2) is a compilation of building standards, including general fire safety standards for new buildings, which are presented with more detail in the California Fire Code (CCR Title 24, Part 9). California Building Code 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 2022 edition of the California Building Code became effective on January 1, 2023. The building standards in the California Building Code apply to all locations in California, except where more stringent standards have been adopted by State agencies and local governing bodies. Typical fire safety requirements of the California Fire Code 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. Specific California Fire Code fire safety regulations have been incorporated by reference in the LAMC with local amendments, as discussed below.

California Fire Service and Rescue Emergency Aid System

The LAFD participates in the California Fire Service and Rescue Emergency Mutual Aid System through which the California Governor's Office of Emergency Service (Cal OES), Fire and Rescue Division is responsible for the development, implementation and coordination of the California Fire Service and Rescue Emergency Mutual Aid Plan (Mutual Aid Plan). The Mutual Aid Plan outlines procedures for establishing mutual aid agreements at the local, operational, regional, and State levels, and divides the State into six mutual aid regions to facilitate the coordination of mutual aid. The LAFD is in Region I. Through the Mutual Aid Plan, Cal OES is informed of conditions in each geographic and organizational area of the State, and the occurrence or imminent threat of disaster. All OES Mutual Aid Plan participants monitor a dedicated radio frequency for fire events that are beyond the capabilities of the responding fire department and provide aid in accordance with the management direction of Cal OES (Cal OES 2019).

California Vehicle Code, Section 21806

Section 21806 of the California Vehicle Code (CVC) pertains to emergency vehicles responding to Code 3 incidents/calls. Code 3 refers to emergency incidents/calls that require immediate response with lights and sirens. This section of the CVC states the following:

> Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as otherwise directed by a traffic officer, do the following: (a) (1) Except as required under paragraph (2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and thereupon shall stop and remain stopped until the authorized emergency vehicle has passed. (2) A person driving

a vehicle in an exclusive or preferential use lane shall exit that lane immediately upon determining that the exit can be accomplished with reasonable safety. (b) The operator of every streetcar shall immediately stop the street car, clear of any intersection, and remain stopped until the authorized emergency vehicle has passed. (c) All pedestrians upon the highway shall proceed to the nearest curb or place of safety and remain there until the authorized emergency vehicle has passed.

California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directs the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-1993 fiscal year. Therefore, the City is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found under Section 35 that cities have "a constitutional obligation to provide adequate fire protection services."

California Governor's Office of Emergency Services

In 2009, the State of California passed legislation creating the Cal OES and authorized it to prepare a Standard Emergency Management System (SEMS) program (Government Code Section 8607; Title 19 CCR Section 2401 et seq.), which sets forth measures by which a jurisdiction should handle emergency disasters. In California, SEMS provides the mechanism through which local government requests assistance. Non-compliance with SEMS could result in the State withholding disaster relief from the non-complying jurisdiction in the event of an emergency. Cal OES coordinates the State's preparation for, prevention of, and response to major disasters, such as fires, floods, earthquakes, and terrorist attacks. During an emergency, Cal OES serves as the lead State agency for emergency management in the state. It also serves as the lead agency for mobilizing the State's resources and obtaining federal resources. Cal OES coordinates the State response to major emergencies in support of local government. The primary responsibility for emergency management resides with local government. Local jurisdictions first use their own resources and, as they are exhausted, obtain more from neighboring cities and special districts, the county in which they are located, and other counties throughout the State through the Statewide mutual aid system (see discussion of Mutual Aid Agreements, above). California Emergency Management Agency (Cal-EMA) maintains oversight of the State's mutual aid system.

c. Local and Regional Laws and Regulations

City of Los Angeles Charter

Section 520 of the Los Angeles City Charter states that the LAFD's duty is to control and extinguish injurious or dangerous fires and to remove that which is liable to cause those fires. It also requires the LAFD to enforce all ordinances and laws relating to the prevention or spread of fires, fire control, and

fire hazards within the city, as well as to conduct fire investigations and protect lives and property in case of disaster or public calamity.

City of Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (Framework Element), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire city of Los Angeles and defines citywide policies regarding land use, including infrastructure and public services.

Relevant goals, objectives, and policies of the Framework Element are provided in Table 4.11-3. Goal 9J of the Infrastructure and Public Services Chapter of the Framework Element specifies that every neighborhood should have the necessary level of fire protection service, emergency medical service, and infrastructure. Objective 9.16 requires that the demand for existing and projected fire facilities and service be monitored and forecasted. Objective 9.17 requires that all areas of the city have the highest level of fire protection and emergency medical service, at the lowest possible cost, to meet existing and future demand. Objective 9.18 requires that the development of new fire facilities be phased with growth. Further, Objective 9.19 requires the maintenance of the LAFD's ability to assure public safety in emergency situations. Under the Framework Element, the City goal for response distance for emergency medical response and the distance of fire stations for engine companies from neighborhood land uses is 1.5 miles. This is consistent with the specifications for response distances within the LAMC.

Table 4.11-3 Applicable Fire Protection-Related Goals, Objectives, and Policies from the Infrastructure and Public Services Chapter of the Framework Element

Goal/Objective/Policy	Description
Goal 9J	Every neighborhood has the necessary level of fire protection service, emergency medical service (EMS) and infrastructure.
Objective 9.16	Monitor and forecast demand for existing and projected fire facilities and service.
Policy 9.16.1	Collect appropriate fire and population development statistics for the purpose of evaluating fire service needs based on existing and future conditions.
Objective 9.17	Assure 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.
Policy 9.17.2	Identify areas of the city with deficient fire facilities and/or service and prioritize the order in which these areas should be upgraded based on established fire protection standards.
Policy 9.17.4	Consider the Fire Department's concerns and, where feasible adhere to them, regarding the quality of the area's fire protection and emergency medical services when developing General Plan amendments and zone changes or considering discretionary land use permits.
Objective 9.19	Maintain the Los Angeles Fire Department's ability to assure public safety in emergency situations.
Policy 9.19.1	Maintain mutual aid or mutual assistance agreements with local fire departments to ensure an adequate response in the event of a major earthquake, wildfire, urban fire, fire in areas with substandard fire protection, or other fire emergencies.
Policy 9.19.3	Maintain the continued involvement of the Fire Department in the preparation of contingency plans for emergencies and disasters.

Source: City of Los Angeles 2001

City of Los Angeles General Plan Safety Element

The City of Los Angeles General Plan Safety Element (Safety Element), adopted on November 24, 2021, includes policies related to the City's response to hazards and natural disasters, including fires. In particular, the Safety Element sets forth requirements, procedures, and standards to facilitate effective fire suppression and emergency response capabilities, as shown in Table 4.11-4. In addition, the City's Safety Element designates disaster routes. Disaster routes in the vicinity of the project site include Harbor Boulevard to the east and Pacific Avenue to the west.

Table 4.11-4 Applicable Fire-Related Goals, Objectives, and Policies from the General Plan Safety Element

Goal/Objective/Policy	Description
Policy 1.1.3	Facility/Systems Location and Maintenance. Locate new critical facilities and infrastructure outside of hazard areas, especially VHFHSZs, when feasible. If no feasible alternative site exists, ensure that these facilities incorporate all necessary protections to allow them to continue to serve essential community needs during and after disaster events. Provide redundancy (back-up) systems and strategies for continuation of adequate critical infrastructure systems and services so as to assure adequate circulation, communications, power, transportation, water and other services for emergency response in the event of disaster related systems disruptions and the growing climate emergency.
Policy 1.1.6	State and Federal Regulations. Assure compliance with applicable State and federal planning and development regulations. Regularly adopt new provisions of the California Building Standards Code, Title 24, and California Fire Code into the LAMC to ensure that new development meets or exceeds Statewide minimums. Ensure new development in VHFHSZs adheres to the California Building Code, the California Fire Code, Los Angeles Fire Code and California Public Resources Code. Facilitate compliance with new standards for existing non-conforming structures and evacuation routes.
Policy 1.1.8	Land Use. Consider hazard information and available mitigations when making decisions about future land use. Maintain existing low density and open space designations in Very High Fire Hazard Severity Zones (VHFHSZ). Ensure mitigations are incorporated for new development in hazard areas such as VHFHSZs, landslide areas, flood zones and in other areas with limited adaptive capacity.
Goal 2	A city that responds with the maximum feasible speed and efficiency to disaster events so as to minimize injury, loss of life, property damage and disruption of the social and economic life of the City and its immediate environs.
Objective 2.1	Develop and implement comprehensive emergency response plans and programs that are integrated with each other and with the City's comprehensive hazard mitigation and recovery plans and programs.
Policy 2.1.5	Response: Develop, implement, and continue to improve the City's ability to respond to emergency events. Participate in regularly scheduled disaster exercises to better prepare Police, Fire, Public Works and other City employees with disaster responsibilities.
	Standards/Fire. Continue to maintain, enforce and upgrade requirements, procedures and standards to facilitate more effective fire suppression and safety. ▪ Enforce peak water supply / fire flow requirements and ensure that new development is able to sufficiently source water, including in VHFHSZs. ▪ Enforce minimum roadway widths and clearances for evacuation and fire suppression. ▪ Maintain special fire-fighting units at the Port of Los Angeles, Los Angeles International Airport, and Van Nuys Municipal Airport capable of responding to special emergencies unique to the operations of those facilities. ▪ Coordinate with CALFIRE, local fire agencies, fire safe councils, private landowners, and other responsible agencies to identify the best method(s) of fuel modification to reduce the

Goal/Objective/Policy	Description
	severity of future wildfires, including: prescribed fire; forest thinning; grazing; mechanical clearing; hand clearing (piling, burning/chipping); education; and defensible space. Maintain mutual aid or mutual assistance agreements with local fire departments to ensure an adequate response in the event of a major earthquake, wildfire, urban fire, fire in areas with substandard fire protection, or other fire emergencies.
Goal 3	A city where private and public systems, services, activities, physical condition and environment are reestablished as quickly as feasible to a level equal to or better than that which existed prior to the disaster.
Objective 3.1	Develop and implement comprehensive disaster recovery plans which are integrated with each other and with the City's comprehensive hazard mitigation and emergency response plans and programs.
Policy 3.1.1	Coordination. Coordinate between City departments, County and State agencies, local jurisdictions and with appropriate private and public entities prior to a disaster to plan and establish disaster recovery programs and procedures which will enable cooperative ventures, reduce potential conflicts, minimize duplication and maximize the available funds and resources to the greatest mutual benefit following a disaster.

Source: City of Los Angeles 2021

San Pedro 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 Framework Element 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 fire protection 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 proposed project is within the San Pedro Community Plan Area (CPA). Table 4.11-5, includes the goals and policies in the San Pedro Community Plan related to fire protection.

Table 4.11-5 Fire and Emergency Services Goals and Policies from the San Pedro Community Plan

Goal/Policy	Description
Goal CF2	Sufficient facilities to provide fire protection and emergency medical services to residents, visitors and businesses.
Policy CF2.1	**Adequate fire and emergency services.** Assist the LAFD to locate fire services facilities in appropriate locations throughout San Pedro to provide adequate fire and emergency services protection.
Policy CF2.2	**LAFD project review.** Coordinate with the LAFD during the review of significant development projects and General Plan amendments affecting land use to determine the impacts on service infrastructure.
Policy CF2.3	**Emergency preparedness.** Coordinate with the LAFD in the identification of primary access routes for emergency preparedness.

Source: City of Los Angeles 2017

Los Angeles Municipal Code

The Los Angeles Fire Code (Fire Code, LAMC Chapter V, Article 7) incorporates by reference portions of the California Fire Code and the International Fire Code. The Fire Code sets forth regulatory requirements pertaining to the prevention of fires; the investigation of fires and 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 storage, use, and handling of hazardous materials. Specific regulations regarding fire prevention and protection are discussed below.

Section 57.107.5.2 provides that the Fire Chief shall have the authority to require drawings, plans, or sketches as may be necessary to identify: (1) occupancy access points; (2) devices and systems; (3) utility controls; (4) stairwells; and (5) hazardous materials/waste.

Section 57.108.7 requires that the installation, alteration, and major repair of the following be performed pursuant to a permit issued by the Department of Building and Safety: LAFD communication systems, building communication systems, automatic elevators, heliports, emergency power systems, fire escapes, private fire hydrants, fire assemblies, fire protective signaling systems, pilot lights and warning lights for heat-producing equipment, refrigerant discharge systems, smoke detectors, emergency smoke control systems, automatic sprinkler systems, standpipe systems, and gas detection systems.

Section 57.118 establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects.

Section 57.118.1.1 requires that development types listed in the Section must include fire/life safety reviews by the Department of Building and Safety and LAFD.

Section 57.408 requires the preparation of an Emergency Plan that establishes dedicated personnel and emergency procedures to assist the LAFD during an emergency incident and establishes a drill procedure to prepare for emergency incidents. The Emergency Plan would also establish an on-site emergency assistance center and establish procedures to be followed during an emergency incident. The Emergency Plan must be submitted to the LAFD for approval prior to implementation and must be submitted annually (and revised if required by the LAFD).

Section 57.4704.5.1 of the LAMC requires that the smoke detectors required by Chapter 9 of the LAMC (Building Code) be maintained in dependable operating condition and tested every six months or as required by the Fire Chief. An accurate record of such tests must be kept by the owner, manager, or person in charge of the property, and such records must be open to examination by the Fire Chief.

Section 57.4705.1.6 requires all new high-rise buildings greater than 75 feet in height (measured from the lowest point with fire access) must contain at least one elevator which shall be available for fire EMS and shall have its controls designed so that key switches located in the building control station/fire command center will recall said elevator or elevators to the designated main floors. The elevator or elevators must be interconnected with the standby power.

Section 57.4705.4 requires each high-rise building to have a rooftop emergency helicopter landing facility in a location approved by the Chief, unless certain life safety features, as specified in LAFD Requirement No. 10, are provided and approved by the Fire Marshal in compliance with two options.

Section 57.503.1.4 requires an approved, posted fire lane whenever any portion of an exterior wall is more than 150 feet from the edge of a roadway.

Section 57.507.3.1 establishes fire water flow standards, which vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas (where local conditions indicate that consideration must be given to simultaneous fires, and additional 2,000 to 8,000 gpm will be required), with a minimum residual water pressure of 20 pounds per square inch (psi) remaining in the water system. Site-specific fire flow requirements are determined by the LAFD based on land use, life hazard, occupancy, and fire hazard level.

Section 57.507.3.2 addresses land use-based requirements for fire hydrant spacing and type. Regardless of land use, every first story of a residential, commercial, or industrial building must be within 300 feet of an approved hydrant. The site-specific number and location of hydrants would be determined as part of LAFD's fire/life safety plan review for each development.

Section 57.507.3.3 limits the maximum response distances to an LAFD station based on the type of land use. Applicable distances are based on LAFD's comment letter for each individual project.

Section 57.512.1 provides that response distances, which are based on land use and fire flow requirements and range from 0.75 mile for an engine company to 2 miles for a truck company, shall comply with Section 57.507.3.3. Where a site's response distance is greater than permitted, all structures must have automatic fire sprinkler systems.

Propositions F and Q

Proposition F, the City of Los Angeles Fire Facilities Bond, was approved by voters in November 2000. This bond allocated $532.6 million of general obligation bonds to finance the construction and rehabilitation of fire stations and animal shelters. Under Proposition F, new regional fire stations to provide training and other facilities at or near standard fire stations must be designed and built on a single site of at least 2 acres. This is to ensure that firefighters in training remain in the service area and are available to respond to emergency calls. Proposition F allocated $378.6 million to build 19 new or replacement neighborhood Fire/Paramedic Stations and an Emergency Air Operations and Helicopter Maintenance Facility, for a total of 20 Proposition F projects. As of January 2017, all the proposed projects have been completed (LAFD 2016). Also, as reported in November 2019, the City of Los Angeles Bureau of Engineering (LABOE) completed the original Proposition F program projects under budget and funded two additional fire stations with the remaining funds and accrued interest (City of Los Angeles Department of Public Works 2019).

Proposition Q, the Citywide Public Safety Bond Measure, was approved by voters in March 2002. Proposition Q allocated $600 million to renovate, improve, expand, and construct public safety (police, fire, 911, and paramedic) facilities. In March 2011, the program was expanded to include renovations to existing LAFD facilities throughout the city. A total of 80 renovation projects at LAFD facilities were scheduled. These renovation projects include the installation of diesel exhaust capture systems, upgrades to air filtration and electrical systems, re-roofing, remodeling, parking lot repair, painting, and other improvements. The fire renovation projects identified under this measure have been completed (City of Los Angeles 2016).

Measure J

Measure J, which was approved by voters at the November 7, 2006, General Election, is a charter amendment and ordinance that involves technical changes to Proposition F. Measure J allows new regional fire stations funded by Proposition F to be in densely developed areas to be designed and built on one or more properties equaling less than 2 acres. Components of a regional fire station can

be built on two or more sites nearby, or the facility can be designed to fit on a single site of less than 2 acres.

Los Angeles Fire Department Strategic Plan 2018–2020

The LAFD Strategic Plan 2018–2020, A Safer City 2.0, is a collaborative effort between LAFD staff, City leaders, and community members to accomplish the LAFD's organizational vision. The Strategic Plan 2018–2020 builds upon the progress of the first Strategic Plan from 2015–2017, which resulted in the achievement of 70 percent of its goals. As provided in the Strategic Plan 2018–2020, five goals will guide the LAFD for the next three years: (1) provide exceptional public safety and emergency service; (2) embrace a healthy, safe and productive work environment; (3) implement and capitalize on advanced technology; (4) enhance LAFD sustainability and community resiliency; and (5) increase opportunities for personal growth and professional development.

4.11.1.3 Environmental Impacts

a. Significance Thresholds and Methodology

Significance Thresholds

In accordance with Appendix G of the CEQA Guidelines, the proposed project could have a potentially significant impact related to fire protection if it were to result in one or more of the following:

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

For this analysis, the Appendix G thresholds listed above are relied upon. The analysis utilizes the following factors in consideration identified in the 2006 L.A. Thresholds Guide (Thresholds Guide), as appropriate, to assist in answering the Appendix G threshold questions.

The Thresholds Guide identifies the following criteria to evaluate impacts to fire protection:

- A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service.

Methodology

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 that would reduce or increase the demand for fire protection and emergency medical 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 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 consultation with the LAFD is also conducted to determine the project effect on fire protection and emergency medical services.

The need for or deficiency in adequate fire protection in and of itself is not a CEQA impact but rather a social and/or economic impact. Where a project causes a need for additional fire protection services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in an EIR and mitigated, if found to be significant. The ultimate determination of whether a project would result in a significant impact to the environment related to fire services is determined by whether construction of new or expanded fire facilities is a reasonably foreseeable direct or indirect effect of the project. There are no capital improvement plans for the construction or expansion of fire facilities in the impact area. Therefore, the City makes the following assumptions based on existing zoning standards and based on historical development of fire or emergency facilities, that in the event that the City determines that expanded or new emergency facilities are warranted, such facilities: (1) would occur where allowed under designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or a Mitigated Negative Declaration.

b. Project Design Features

No specific design features are proposed with regard to fire services. However, as discussed in Section 4.13, *Transportation*, pursuant to Project Design Feature (PDF) T-1, the project would implement a construction management plan that would include provisions for maintaining emergency access to the project site and surroundings during construction. PDF T-1 is duplicated below.

PDF T-1 Construction Management Plan

Prior to the start of construction, a Construction Management Plan will be prepared and submitted to LADOT for review and approval in accordance with the time frames set forth in Executive Directive 1. The Construction Management Plan will include a Worksite Traffic Control Plan and Construction Worker Parking Plan that will facilitate traffic and pedestrian movement, minimize the potential conflicts between construction activities, street traffic, bicyclists and pedestrians, and ensure appropriate parking for construction workers is provided. Furthermore, the Construction Management Plan will include, but not be limited to, the following measures:

- A Worksite Traffic Control Plan(s), approved by the LADOT in accordance with the time frames set forth in Executive Directive 1, will be implemented to route vehicular traffic, transit, bicyclists, and pedestrians around any lane and/or sidewalk closures;
- Safety precautions for pedestrians and bicyclists will be implemented through such measures as alternate routing and protection barriers as appropriate, especially as it pertains to maintaining safe access to the Port of Los Angeles High School;
- Minimize obstruction to land uses in proximity to the project site during construction, including temporary traffic constraints, temporary loss of access, and temporary loss of bus stops or rerouting of bus lines;
- Parking for construction workers will be provided either on-site or at off-site, off-street locations; and
- Ensure adequate emergency access is maintained to the project site and neighboring businesses and residences.

c. Project Impacts and Mitigation Measures

Threshold 1:	Would the project 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?

Impact PS-1 THE PROPOSED PROJECT WOULD ACCOMMODATE INCREASED RESIDENTIAL, COMMERCIAL, AND NEIGHBORHOOD SERVING DEVELOPMENT ON THE PROJECT SITE, WHICH WOULD INCREMENTALLY INCREASE THE SERVICE POPULATION AND DEMANDS FOR LAFD SERVICES. NONETHELESS, THE PROPOSED PROJECT WOULD COMPLY WITH THE APPLICABLE CITY AND LAFD REQUIREMENTS FOR FIRE SAFETY, EMERGENCY ACCESS, AND FIRE FLOW TO MINIMIZE THE POTENTIAL FOR INCIDENTS REQUIRING AN EMERGENCY RESPONSE BY LAFD. WITH COMPLIANCE WITH THESE REGULATORY REQUIREMENTS, THE PROJECT WOULD NOT REQUIRE THE CONSTRUCTION OF NEW OR PHYSICALLY ALTERED FIRE STATION FACILITIES TO MAINTAIN ACCEPTABLE SERVICE RATIOS, RESPONSE TIMES, OR PERFORMANCE OBJECTIVES FOR FIRE PROTECTION. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The proposed project includes two development scenarios (see Section 2, *Project Description*) that would involve phasing the construction in two different development patterns on the OSP Specific Plan Site. Under Scenario A, the densest development would be located in Phases 2 and 3, whereas under Scenario B, development would be densest in Phases 1 and 2 (refer to Figure 2-4 in Section 2, *Project Description*, for a map of the Phases). Under both scenarios, the footprint of development would be identical, and the amount of residential and nonresidential development would be the same. Development at the 327 Harbor Site would be identical under both development scenarios and would include construction of 47 affordable housing units. Accordingly, this analysis applies to both Scenario A and Scenario B.

Construction

Construction activities associated with the development of the proposed project could temporarily increase existing demand for fire protection and EMS services. Construction activities could expose combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, exposed electrical lines, and chemical reactions in combustible materials and coatings. However, in compliance with Cal/OSHA requirements, including 29 Code of Federal Regulations, Part No. 1926, construction managers and personnel would be trained in emergency response and fire safety operations. Training would include monitoring and management of life safety systems and facilities, such as those set forth in the Safety and Health Regulation for Construction established by OSHA. In addition, fire suppression equipment (e.g., fire extinguishers) would be maintained throughout the project site during construction. Project construction would also occur in compliance with all federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials, as discussed in Section 4.6, *Hazards and Hazardous Materials*. Thus, compliance with regulatory requirements would effectively reduce the potential for project construction activities to expose people to the risk of fire or explosion related to hazardous materials and nonhazardous combustible materials.

During project construction, occasional lane closures would be required for utilities and roadway improvements. Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials, and construction worker traffic. Lane closures and increased traffic due to construction activities could temporarily affect travel

times of fire and emergency services vehicles. However, travel would be maintained on all streets around the project site throughout the construction period and emergency access would be maintained throughout construction. In addition, a Construction Management Plan developed in coordination with LADOT would be implemented during project construction pursuant to PDF T-1 to ensure that adequate and safe access remains available within and near the project site during construction activities. The project would also employ temporary traffic controls such as flag persons to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the project site and traffic flow is maintained on adjacent rights-of-way. Furthermore, pursuant to the CVC Section 21806, the drivers of emergency vehicles can avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

With the implementation of the Construction Management Plan, pursuant to PDF T-1, project construction would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire facilities, or the need for new or physically altered fire facilities, the construction of which would cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. Therefore, impacts to fire protection and emergency medical services during project construction would be less than significant.

Operation

Facilities, Equipment, and Response Distance

The proposed project would result in an estimated total residential population of approximately 3,872 people, which represents a net increase of 2,715 residents compared to existing uses. In addition, new jobs associated with the commercial and Neighborhood Serving Uses would result in approximately 314 employees on the OSP Specific Plan Site (refer to Section 4.10, *Population and Housing*, for a detailed analysis of the potential number of residents and employees associated with buildout of the project). Thus, development of the proposed project would increase the residential service population and the amount and scale of structural development on the project site, which would increase the demand for LAFD fire protection.

The project site is expected to continue to be served by Fire Station Nos. 112, 36, 48, 40, and 101. Fire Station No. 112 would be designated “first in” station for the project, located approximately 0.5 mile from the project site. Fire Station No. 112 has 14 staff personnel, and services and equipment include the following: an engine, a large boat, paramedic rescue, and an EMS supervisor. Based on criteria regarding response distance, pursuant to LAMC Section 57.507.3.3, the project site is located within 1.0 mile of a fire station with an engine company and within 1.5 miles of a fire station with a truck company. Based on the response distance from existing fire stations criteria, LAFD has determined fire protection for the project site would be adequate (LAFD 2022b).

The proposed uses would be expected to generate a range of fire service calls like other such typical residential and commercial/retail/office uses. The project would not include any unique or especially hazardous use, such as industrial facilities that use or generate large quantities of hazardous and or/toxic material, that could pose an extreme risk of serious accident or fire at the project site. Suppression of types of fires that could occur on the project site would be adequately met with fire equipment found at the fire stations nearest to the project site.

Additionally, the project would be required to adhere to City Building and Fire Code regulations including, but not limited to, structural design, building materials, site access, clearance, hydrants, fire flow, storage and management of hazardous materials, alarm and communications systems, and building sprinkler systems. The project would provide all applicable life safety features, including automatic fire sprinklers, a video camera surveillance system, egress stairways, fire service access elevators, stairways with roof access, enclosed elevator lobbies, emergency helicopter landing facilities (as applicable), and escalator openings or stairways. Compliance with applicable City Building Code and Fire Code requirements would be confirmed as part of LAFD's fire/life safety plan review and fire/life safety inspection for new construction projects, as set forth in LAMC Section 57.118, prior to issuance of a building permit. Therefore, the project would be designed to minimize the potential of incidents requiring an emergency response by LAFD.

The project would increase the service population of the LAFD by less than 1.0 percent overall, which would not represent a substantial increase. Therefore, operation of the proposed project would not result in the need for a new fire station, or the expansion, consolidation, or relocation of an existing fire station. In accordance with fire protection-related goals, objectives, and policies set forth in the City's Framework Element, the Safety Element, and the San Pedro Community Plan, as listed in the regulatory framework above, the City and LAFD would continue to monitor the demand for existing and projected fire facilities (refer to Objective 9.16 of the Framework Element, Policy 2.1.6 of the Safety Element, and Goal CF2 of the San Pedro Community Plan) and coordinate the development of new facilities to be phased with growth (Objective 9.18 of the Framework Element). Therefore, project impacts with regard to LAFD facilities and equipment would be less than significant.

Emergency Access

As discussed in Section 2, *Project Description*, vehicular access, including emergency access, to the project site and surrounding areas would continue to be provided by the surrounding roadways, including Santa Cruz Street, Palos Verdes Street, Beacon Street, Harbor Boulevard, 1st Street, 2nd Street, 3rd Street, Mesa Street, Centre Street, and O'Farrell Street. The OSP Specific Plan would slightly alter the existing vehicle access patterns on the site by vacating 2nd Street between Harbor Boulevard and Palos Verdes Street and Beacon Street between 1st Street and 3rd Street to create pedestrian promenades and provide public access easements. Vehicular access to the OSP Specific Plan Site would be provided by 14 driveways as follows: four driveways onto 1st Street, four driveways onto 2nd Street, two driveways onto 3rd Street, one driveway onto Mesa Street, one driveway onto Santa Cruz Street, and two driveways onto Harbor Boulevard. Vehicular access to the 327 Harbor Site would be provided by a two-way driveway off O'Farrell Street.

The project's driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, including adequate emergency vehicle and LAFD personnel access as described in the written correspondence from LAFD (LAFD 2022b). The area surrounding the project site includes an established street system, consisting of freeways, primary and secondary arterials, and collector and local streets that provide regional, subregional, and local access and circulation in the project vicinity. Although the OSP Specific Plan would involve the permanent closure of two street segments, the project would not include the installation of any other barriers that could impede emergency vehicle access, and the surrounding street system would continue to provide adequate emergency access to the project site and surroundings. Based on the project site location in a highly urbanized area of Los Angeles, the streets surrounding the project site were designed as standard streets in terms of pavement width and thickness, curb and gutter, and horizontal and vertical curvature, and are accessible by emergency vehicles. Furthermore, drivers of emergency vehicles have the ability to avoid traffic by using sirens and flashing lights to clear the path

of travel, pursuant to CVC Section 21806. As such, emergency access to the project site and surrounding uses would be maintained throughout project operation.

Compliance with applicable City Building Code and Fire Code requirements, including emergency vehicle access, would be confirmed as part of LAFD's fire/life safety plan review and fire/life safety inspection for new construction projects in accordance with the LAMC Section 57.118 prior to the issuance of building permits. Emergency access to the project site and surrounding area would be provided and/or maintained, and impacts to emergency access would be less than significant.

Fire Flow

In addition to providing domestic water service, LADWP provides water to the project site for fire protection services in accordance with the City's Fire Code (LAMC Chapter V, Article 7). According to the Information of Fire Flow Availability for the OSP Specific Plan Site provided by LADWP on June 24, 2022, there are four fire hydrants serving the OSP Specific Plan Site: one at the southwest corner of Santa Cruz Street and Beacon Street, one at the southwest corner of 1st Street and Centre Street, one at the southwest corner of 2nd Street and Harbor Boulevard, and one 250 feet east of the 2nd Street and Centre Street intersection. Total flow available to the OSP Specific Plan Site from these four hydrants is 6,000 gpm (LADWP 2022a). According to the Information of Fire Flow Availability provided by LADWP on June 24, 2022, there are four fire hydrants serving the 327 Harbor Site: these include hydrants located at the southwest corner of O'Farrell Street and Beacon Street, the southwest corner of O'Farrell Street and Harbor Boulevard, 200 feet north of the O'Farrell and Harbor Boulevard intersection on O'Farrell Street, and at the east side of the O'Farrell Street and Harbor Boulevard intersection. Total flow available to the 327 Harbor Site from these four hydrants is 6,000 gpm (LADWP 2022b).

Domestic and fire water service to the project site would continue to be supplied by LADWP. Fire flow to the project site would be required to meet City fire flow requirements as set forth in Section 57.507.3.1 of the LAMC, which establishes fire flow standards by development type. The adequacy of fire protection for a given area is based on required fire flow, response distance from existing fire stations, and LAFD's judgment for needs in the area. In general, the required fire flow is closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. As identified by the LAFD in the written correspondence provided in Appendix H of this Draft EIR/EIS, the required fire water flow for the OSP Specific Plan Site is 4,000 gpm from four adjacent hydrants flowing simultaneously with a minimum residual water pressure of 20 psi. The required fire water flow for the 327 Harbor Boulevard has been set at 6,000-9,000 gpm from four to six adjacent hydrants flowing simultaneously with a minimum residual water pressure of 20 psi. Based on initial consultation with LADWP and LAFD, the existing fire hydrants serving the project site fall within the fire flow requirements (LADWP 2022a and 2022b; LAFD 2022b). If later required by the LAFD during its fire/life safety plan review, the project would install additional fire hydrant(s) to meet the hydrant spacing requirements as set forth in LAMC Section 57.507.3.2. The number and location of hydrants would be determined as part of LAFD's fire/life safety plan review for the project. Furthermore, the project would incorporate a fire sprinkler suppression system, which would be subject to LAFD review and approval during the design and permitting of the project and would reduce the public hydrant demands. Therefore, the project's impacts with respect to fire flow would be less than significant.

Based on the analysis above and the constitutional requirement stated in the California Constitution Article XIII, Section 35(a)(2) to provide fire protection services, it is reasonable to conclude that project operation would not inhibit LAFD emergency response or require the addition of a new fire station or

the expansion, consolidation, or relocation of an existing facility to maintain service. Therefore, operation of the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire station facilities, the construction of which would cause significant environmental impacts, to maintain acceptable fire protection services. Project impacts to fire protection services would be less than significant.

Mitigation Measures

Project-level impacts with regard to fire protection would be less than significant. Therefore, no mitigation measures are required.

Significance After Mitigation

Project-level impacts with regard to fire protection were determined to be less than significant without mitigation.

4.11.1.4 Cumulative Impacts

Cumulative growth near the proposed project site includes specific known development projects and general ambient growth. A total of 12 cumulative projects have been identified in the vicinity of the proposed project site, as listed in Section 3.4, *Cumulative Development*. As detailed in Section 4.10, *Population and Housing*, the 12 cumulative projects considered within the vicinity of the proposed project anticipate adding approximately 1,508 residential units, resulting in approximately 3,649 new residents in the city. The increase in development and service populations from the proposed project, cumulative projects, and other future development in the San Pedro CPA would result in a cumulative increase in the demand for fire protection. Cumulative impacts to fire protection due to construction and operation of cumulative development are discussed further below.

Construction

In general, impacts to LAFD services and facilities during the construction of each cumulative project would be addressed as part of each cumulative project's development review process conducted by the City. Should the proposed project's construction occur concurrently with cumulative projects in proximity to the project site, specific coordination among these multiple construction sites would be required and implemented through the proposed project's construction management plan (as required by PDF T-1), to be developed in consultation with LADOT, which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-way. In addition, each cumulative project would implement similar design features during construction, such as construction management plans, and would be subject to the City's routine construction permitting process, which includes a review by the LAFD to ensure that sufficient fire safety and emergency access measures are implemented during construction. Finally, the proposed project in and of itself would not cause a significant impact to fire protection services during construction. Therefore, cumulative impacts to fire protection during construction would be less than significant.

Operation

The proposed project combined with cumulative development would result in a net increase of 6,364 residents in the project area, as well as a reduction of 486 employees. As concluded in the written correspondence from LAFD included in Appendix H of this Draft EIR/EIS, development of the proposed project combined with cumulative projects in the vicinity could result in a cumulative impact on fire

protection services, such as requiring increased staffing, additional fire protection facilities, and the relocation of present fire protection facilities, if the proposed project, together with other development in the service area, did not comply with LAFD requirements for design and construction. However, similar to the proposed project, the cumulative projects and other future development projects in the San Pedro CPA would be reviewed by LAFD to ensure that sufficient fire safety and hazards measures are implemented to reduce potential impacts to fire protection and emergency medical services. Furthermore, each cumulative project and other future development projects in the San Pedro CPA would be required to comply with regulatory requirements related to fire protection and would be subject to the City's standard construction permitting process. This includes a review by LAFD for compliance with building and site design standards related to fire/life safety, as well as coordinating with LADWP to ensure that local fire flow infrastructure meets current code standards for the type and intensity of land uses involved.

As with the proposed project, the cumulative projects and other future development projects in the San Pedro CPA would also generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new fire station facilities and related staffing, as deemed appropriate by the City. Cumulative increases in demand for fire protection and emergency medical services due to cumulative projects and other future development projects in the San Pedro CPA would be identified and addressed through the City's annual programming and budgeting processes. LAFD resource needs would be identified and monies allocated according to the priorities at the time. Any requirement for a new fire station, or the expansion, consolidation, or relocation of an existing fire station would also be identified through this process, the impacts of which would be addressed accordingly. LAFD would continue to monitor population growth and land development throughout the city and identify additional resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, which may become necessary to achieve the required level of service.

Consistent with the California Constitution Article XIII, Section 35(a)(2) discussed in Section 4.11.1.2, *Regulatory Setting*, above, the obligation to provide adequate fire protection services is the responsibility of the City. Through the City's regular budgeting efforts, LAFD's resource needs, including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction, would be identified and allocated according to the priorities at the time. At this time, LAFD has not identified any planned new station construction in the area impacted by the proposed project (LAFD 2022b). However, if a new fire station, or the expansion, consolidation, or relocation of an existing station, was determined to be warranted by LAFD in the future, 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 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Sections 15301 or 15332 or a Mitigated Negative Declaration and, as such, would not be expected to result in significant impacts[2]. Therefore, development of a station at this scale is unlikely to result in significant unmitigated impacts, and projects involving the construction or expansion of a fire station would be addressed independently pursuant to CEQA.

[2] Although an EIR was prepared for the construction of LAFD Fire Station No. 39, the EIR concluded there would be no significant impacts (City of Los Angeles 2014).

Based on the above, the proposed project and cumulative development would not result in significant cumulative impacts associated with the provision of new or physically altered fire protection facilities, the construction of which would cause significant environmental impacts, to maintain service. As such, cumulative impacts related to fire protection would be less than significant.

4.11.2 Police Protection

4.11.2.1 Environmental Setting

a. LAPD Service Area and Bureaus

The City of Los Angeles Police Department (LAPD) is one of the largest municipal police departments in the nation and provides police protection services to the entire city of Los Angeles, an area that encompasses 473 square miles. The LAPD consists of four geographic bureaus (Valley, West, Central, and South) with 21 subdivisions. Each geographic bureau has four to seven geographic area police stations. In 2022, the LAPD had 9,367 sworn police officers and 2,723 civilian personnel (LAPD 2022a). Based on the city's estimated 2022 population of 3,819,538, the LAPD currently has an officer ratio of approximately 2.5 officers for every 1,000 residents (California Department of Finance 2022). The LAPD handled an estimated 1,442,254 telephone calls for service in 2022 (LAPD 2022b). The average citywide response time is approximately 6.1 minutes (SoCal Patch 2017). The LAPD response time goal for emergency calls is seven minutes or less (LAPD 2021).

The project site is within the South Bureau, which covers a territory of approximately 58 square miles with a population of approximately 640,000 residents. The South Bureau oversees operations in the Southwest, Harbor, 77th Street, and Southeast Divisions, as well as the South Traffic Division and South Bureau Homicide Division. The project site is located within the Harbor Community Division of the South Bureau (LAPD 2023a). Law enforcement in the project area is also provided by the Los Angeles Port Police, which provides law enforcement protection specific to the Port of Los Angeles along 43 miles of waterfront in the San Pedro and Long Beach areas (Los Angeles Port Police 2023).

b. Police Facilities

The project site is served by the LAPD Harbor Community Police Station located at 2175 John S. Gibson Boulevard, approximately 1.5 miles north of the project site. In addition, the Los Angeles Port Police Headquarters is located approximately 300 feet south of the OSP Specific Plan Site, at 330 Centre Street. Figure 4.11-2 shows police facilities that would serve the project.

The Harbor Community Police Station has a service area of approximately 27 square miles and serves the neighborhoods of San Pedro, Wilmington, Harbor City, and the Harbor Gateway. The LAPD Harbor Community Division includes a service population of approximately 171,000 persons and is staffed by approximately 264 sworn officers (City of Los Angeles 2017; LAPD 2023b). As such, the officer-to-resident ratio in the Harbor Community Division is approximately 1.54 officers per 1,000 residents and is lower than the citywide ratio of 2.5 officers per 1,000 residents.

Figure 4.11-2 Police Facilities in the Project Area

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Additional data provided by Los Angeles County, 2023.

Fig 4.8-1 Land Use and Planning
Fig 4.11-2 Police Protection Facilities

4.11.2.2 Regulatory Setting

a. State Laws and Regulations

California Vehicle Code, Section 21806

Section 21806 of the CVC pertains to emergency vehicles responding to Code 3 incidents/calls. Code 3 refers to emergency incidents/calls that require immediate response with lights and sirens. This section of the CVC states the following:

> Upon the immediate approach of an authorized emergency vehicle which is sounding a siren and which has at least one lighted lamp exhibiting red light that is visible, under normal atmospheric conditions, from a distance of 1,000 feet to the front of the vehicle, the surrounding traffic shall, except as otherwise directed by a traffic officer, do the following: (a) (1) Except as required under paragraph (2), the driver of every other vehicle shall yield the right-of-way and shall immediately drive to the right-hand edge or curb of the highway, clear of any intersection, and thereupon shall stop and remain stopped until the authorized emergency vehicle has passed. (2) A person driving a vehicle in an exclusive or preferential use lane shall exit that lane immediately upon determining that the exit can be accomplished with reasonable safety. (b) The operator of every street car shall immediately stop the street car, clear of any intersection, and remain stopped until the authorized emergency vehicle has passed. (c) All pedestrians upon the highway shall proceed to the nearest curb or place of safety and remain there until the authorized emergency vehicle has passed.

California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively for local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include police protection. Section 30056 provides that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-1993 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on police protection, as well as other public safety services. Section 35, subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." In *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including police protection, and that it is reasonable to conclude the City will comply with that provision to ensure public safety services are provided.

California Penal Code

All law enforcement agencies in California are organized and operated in accordance with the applicable provisions of the California Penal Code. This code sets forth the authority, rules of conduct, and training for peace officers. Under State law, all sworn municipal and county officers are State peace officers.

b. Local and Regional Laws and Regulations

County of Los Angeles Office of Emergency Management

The County of Los Angeles Office of Emergency Management, established by Chapter 2.68 of the Los Angeles County Code, is responsible for organizing and directing emergency preparedness efforts, as well as the day-to-day coordination efforts, for the County's Emergency Management Organization. The OEM's broad responsibilities include, among others, planning and coordination of emergency services on a countywide basis (County of Los Angeles Chief Executive Office 2022).

Los Angeles County organizes a formal mutual aid agreement between all police departments within its jurisdiction to provide police personnel and resources to assist other member agencies during emergencies and/or conditions of extreme peril. This ensures adequate resources should an emergency arise that requires immediate response by more law enforcement personnel than would be available to LAPD using only its own available resources.

City of Los Angeles General Plan Framework Element

The Framework Element provides a comprehensive vision for long-term growth within the city and sets forth general guidance regarding land use issues for the entire city of Los Angeles and defines citywide policies regarding land use, including infrastructure and public services.

Relevant goals, objectives, and policies of the Framework Element are provided in Table 4.11-6. Goal 9I of the Infrastructure and Public Services Chapter of the Framework Element states that every neighborhood should have the necessary police services, facilities, equipment, and personnel required to provide for the public safety needs of that neighborhood. Related Objective 9.13 and Policy 9.13.1, which implement Goal 9I, require 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 be available to meet existing and future public needs. Policies related to Objective 9.14 generally provide guidance for public agencies. Objective 9.15 requires LAPD 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.

Table 4.11-6 Applicable Police-Related Goals, Objectives, and Policies from the Infrastructure and Public Services Chapter of the Framework Element

Goal/Objective/Policy	Description
Goal 9I	Every neighborhood has the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.
Objective 9.13	Monitor and forecast demand for existing and projected police service and facilities.
Policy 9.13.1	Monitor and report police statistics, as appropriate, and population projections for the purpose of evaluating police service based on existing and future needs.
Objective 9.14	Protect the public and provide adequate police services, facilities, equipment and personnel to meet existing and future needs.
Policy 9.14.1	Work with the Police Department to maintain standards for the appropriate number of sworn police officers to serve the needs of residents, businesses, and industries.
Policy 9.14.5	Identify neighborhoods in Los Angeles where facilities are needed to provide adequate police protection.
Policy 9.14.7	Participate fully in the planning of activities that assist in defensible space design and utilize the most current law enforcement technology affecting physical development.

Goal/Objective/Policy	Description
Objective 9.15	Provide for adequate public safety in emergency situations.
Policy 9.15.1	Maintain mutual assistance agreements with local law enforcement agencies, State law enforcement agencies, and the National Guard to provide for public safety in the event of emergency situations.

Source: City of Los Angeles 2001

San Pedro Community Plan

The project site is within the boundary of the San Pedro Community Plan. Table 4.11-7, shows the goals and policies of the San Pedro Community Plan related to police protection.

Table 4.11-7 Police Goals and Policies from the San Pedro Community Plan

Goal/Policy	Description
Goal CF1	Sufficient police facilities and personnel to protect the community from criminal activity and reduce the incidence of crime.
Policy CF1.1	**Adequate police facilities and service.** Maintain police facilities and services at a level that is adequate to protect the San Pedro community.
Policy CF1.2	**Design for security.** Ensure that landscaping around buildings does not impede visibility and provide hidden places, which could foster criminal activity.
Policy CF1.3	**Illumination for security.** Provide adequate low level lighting around residential, commercial and industrial buildings, and park, school and recreational areas to improve security.
Policy CF1.4	**Safe recreational facilities.** Design recreational facilities in multiple-family residential developments to provide adequate visibility and security.

Source: City of Los Angeles 2017

City of Los Angeles Charter

The City Charter at Section 570 gives the power and the duty to the LAPD to enforce the penal provisions of the Charter, City ordinances, and State and federal laws. 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.

Administrative and Municipal Codes

Section 22.240 of the Administrative Code requires the LAPD to adhere to the State standards described in Section 13522 of the California Penal Code for the training of police dispatchers. LAMC Chapter 5 includes regulations, enforceable by the police, related to firearms, 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 LAFD in the enforcement of the City's Fire, Building, and Health Codes. The LAPD is also given the power and the duty to protect residents and property and to review and enforce specific security-related mitigation measures for new development.

Los Angeles Police Department Computer Statistics Division

The LAPD Computer Statistics Unit program was created in 1994 and implements the Framework Element goal of assembling statistical population and crime data to determine necessary crime prevention actions. This system implements a multi-layer approach to police protection services

through statistical and geographical information system (GIS) analysis of growing trends in crime through its specialized crime control model. The LAPD Computer Statistics (COMPSTAT) Division has effectively and significantly reduced the occurrence of crime in Los Angeles communities through accurate and timely intelligence regarding emerging crime trends or patterns (LAPD 2023c).

LAPD Guidelines and Plan Review

Projects subject to City review are required to develop an Emergency Procedures Plan to address emergency concerns and practices. The plan is subject to review by LAPD. In addition, projects are encouraged to comply with the LAPD's Design Out Crime Guidelines, which incorporates techniques of Crime Prevention Through Environmental Design and seeks to deter crime through the design of buildings and public spaces. Specifically, projects are recommended to:

Provide on-site security personnel whose duties shall include but not be limited to the following:

- Monitoring entrances and exits
- Managing and monitoring fire/life/safety systems
- Controlling and monitoring activities in parking facilities
- Install security industry standard security lighting at recommended locations, including parking structures, pathway options, and curbside queuing areas
- Install closed-circuit television at select locations, including (but not limited to) entry and exit points, loading docks, public plazas and parking areas
- Provide adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment
- Provide lighting of building entries, pedestrian walkways, and public open spaces to provide pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings
- Design public spaces to be easily patrolled and accessed by safety personnel
- Design entrances to and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites
- Limit visually obstructed and infrequently accessed "dead zones"

4.11.2.3 Environmental Impacts

a. Significance Thresholds and Methodology

Significance Thresholds

Impacts related to police protection would be potentially significant if they exceed the following significance criteria in accordance with Appendix G of the CEQA Guidelines:

1. 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 services.

For this analysis, the Appendix G thresholds listed above are relied upon. The analysis utilizes the following factors in consideration identified in the Thresholds Guide, as appropriate, to assist in answering the Appendix G threshold questions.

The Thresholds Guide identifies the following criteria to evaluate impacts to police protection services:

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

Methodology

According to the Thresholds Guide, the police service demand relates to the size and characteristics of the community, population, and the geographic areas served, and the number and type of calls for service. Changes in these factors resulting from a project may affect the demand for services, and in turn, new or physically altered government facilities. As such, the determination of significance on police services is based on the evaluation of existing police services for the police station serving the project site, including the availability of police personnel to serve the estimated project population. The analysis presents statistical averages associated with the police station serving the project site and citywide services and based on guidance from the LAPD, focuses on the increase in the residential population from the project. Project design features that would reduce the impacts to police services are also described.

The need for or deficiency in adequate police protection in and of itself is not a CEQA impact but rather a social and/or economic impact. Where a project causes a need for additional police protection services resulting in the need to construct new facilities or additions to existing facilities, and the construction results in a potential impact to the environment, then the impact would need to be assessed in an EIR and mitigated, if found to be significant. The ultimate determination of whether a project would result in a significant impact to the environment related to police services is determined by whether construction or new or expanded police facilities is a reasonably foreseeable direct or indirect effect of the project. There are no capital improvement plans for the construction or expansion of police facilities in the impact area. Therefore, the City makes the following assumptions based on existing zoning standards and based on historical development of police facilities, that in the event that the City determines that expanded or new emergency facilities are warranted, such facilities: (1) would occur where allowed under designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Sections 15301 or 15332 or a Mitigated Negative Declaration.

b. Project Design Features

In addition to PDF T-1, listed above under Section 4.11.1, *Fire Protection*, the following PDFs are proposed to increase project site security and minimize the project's demand for police protection services:

PDF POL-1 Construction Security

During construction on the OSP Specific Plan site and the 327 Harbor Site, the project Applicant will implement temporary security measures including security fencing (e.g., chain-link fencing), low-level security lighting, and locked entry (e.g., padlocked gates or guard-restricted access) to limit access by the general public. Regular private security patrols during non-construction hours will be provided.

PDF POL-2 Safety Lighting

As required by OSP Specific Plan, the project will provide sufficient lighting of building entries and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings. The project will also provide sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment. This requirement will also apply to development on the 327 Harbor Site.

PDF POL-3 Operational Security

The project will provide a security program to ensure the safety of residents, employees, and other visitors to the project site. The project would incorporate strategies in design and planning, as well as active security features. On-site security measures during project operation would include:

- Provide on-site security personnel whose duties shall include, but not be limited to, the following:
  - Monitoring entrances and exits;
  - Patrol the perimeter of the property;
  - Control and monitor activities in the public spaces and private outdoor areas;
  - Managing and monitoring fire/life/safety systems; and
  - Controlling and monitoring activities in the parking facilities.
- Install security industry standard security lighting at recommended locations, including parking areas, pedestrian pathways, and alleys.
- Install closed-circuit television at select locations, including, but not limited to, entry and exit points, lobby areas, outdoor open spaces, and parking areas.
- Provide adequate lighting of parking areas, elevators, and lobbies to reduce areas of concealment.
- Provide lighting of building entries and open spaces to provide pedestrian orientation and to clearly identify a secure route between the parking areas and access points.
- Prominently display throughout the project site the contact information for on-site security staff.

This PDF will also apply to the 327 Harbor Site.

c. Project Impacts and Mitigation Measures

Threshold 1:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or 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?

Impact PS-2 THE PROPOSED PROJECT WOULD ACCOMMODATE INCREASED RESIDENTIAL, COMMERCIAL, AND NEIGHBORHOOD SERVING DEVELOPMENT ON THE PROJECT SITE, WHICH WOULD INCREMENTALLY INCREASE THE DEMAND FOR POLICE PROTECTION SERVICES. NONETHELESS, THE PROPOSED PROJECT WOULD INCLUDE CRIME PREVENTION FEATURES AND PRIVATE SECURITY, WHICH WOULD LIMIT DEMAND FOR LAPD SERVICES. ADDITIONALLY, BASED ON CONSULTATION WITH LAPD, NO NEW OR PHYSICALLY ALTERED POLICE FACILITIES WOULD BE REQUIRED TO SERVE THE PROPOSED PROJECT. THEREFORE, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The proposed project includes two development scenarios (see Section 2, *Project Description*) that would involve phasing the construction in two different development patterns on the OSP Specific Plan Site. Under Scenario A, the densest development would be located in Phases 2 and 3, whereas under Scenario B, development would be densest in Phases 1 and 2 (refer to Figure 2-4 in Section 2, *Project Description*, for a map of the Phases). Under both scenarios, the footprint of development would be identical, and the amount of residential and nonresidential development would be the same. Development at the 327 Harbor Site would be identical under both development scenarios and would include construction of 47 affordable housing units. Accordingly, this analysis applies to both Scenario A and Scenario B.

As indicated on Figure 4.11-2, there are two police stations located within 1.5 miles of the project site: the Los Angeles Port Police Headquarters, which is approximately 0.2 mile south of the project site, and the Harbor Community Division Police Station, which is approximately 1.4 miles northwest of the project site.

Construction

Construction of the project would not generate a permanent new population on the project site that would substantially increase the police protection necessary in the San Pedro CPA since the daytime population (i.e., construction workers and associated services) at the project site during construction would be temporary. However, construction sites can be subject to theft and vandalism and thereby become sources of nuisance and hazard. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. Pursuant to PDF POL-1, the project Applicant would implement temporary security measures, including security, fencing, lighting, and locked entry, to the project site during construction. The Applicant would also provide regular security patrols during non-construction hours. With implementation of these security measures, the potential demand on police protection services would be reduced at the project site relative to theft and vandalism during construction. Thus, temporary construction activities associated with the project would not increase demand for police protection services that would substantially exceed the capability of the LAPD to serve the project site that would necessitate new police station facilities.

Project construction activities could affect LAPD response times if the transportation capacity of adjacent streets were to be reduced. During project construction, occasional lane closures would be

required for utilities and roadway improvements. Construction activities would also generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials, and construction worker traffic. Lane closures and increased traffic due to construction activities could temporarily affect travel times of police vehicles. However, travel maintained on all streets around the project site throughout the construction period and emergency access would be maintained throughout construction. In addition, a Construction Management Plan developed in coordination with LADOT would be implemented during project construction, pursuant to PDF T-1, to ensure that adequate and safe access remains available within and near the project site during construction activities. The project would also employ temporary traffic controls, such as flag persons, to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the project site and traffic flow is maintained on adjacent rights-of-way. Furthermore, pursuant to the CVC Section 21806, the drivers of emergency vehicles can avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Based on the above analysis, construction activities associated with the project would not generate demand for additional police protection services that would necessitate the provision of new physically altered police facilities. As such, the project would not result in adverse physical impacts associated with the construction of new or altered police facilities. Therefore, impacts on police protection during project construction would be less than significant.

Operation

Service Ratio

The proposed project would result in an estimated total residential population of approximately 3,872 people, which represents a net increase of 2,715 residents compared to existing uses. In addition, new jobs associated with the commercial and Neighborhood Serving Uses would result in approximately 314 employees on the OSP Specific Plan Site (refer to Section 4.10, *Population and Housing*, for a detailed analysis of the potential number of residents and employees associated with buildout of the project).

As discussed above, law enforcement in San Pedro is provided by a combination of the LAPD and the Los Angeles Port Police. The LAPD Harbor Community Division has approximately 264 sworn police officers (City of Los Angeles 2017). Based on the current population of 171,000 residents within the division, the Harbor Community Division currently has an officer ratio of approximately 1.54 officers for every 1,000 residents. The project would reduce the officer ratio to 1.52 officers for every 1,000 residents. This represents a less than 2.0-percent change in the officer-to-resident ratio of the service area, and therefore, there would not be significant decrease in the officer-to-resident ratio.

To further reduce impacts to police services in the Harbor Community Division, the project would incorporate crime prevention measures into the project's design, as well as implement comprehensive safety and security measures, including adequate and strategically positioned functional and thematic lighting to enhance public safety, installation of closed-circuit television at select locations, including, but not limited to, entry and exit points, lobby areas, outdoor open spaces, and parking areas, and provision of on-site security personnel. The measures are incorporated into the project as PDF POL-2 and PDF POL-3. The proposed project has been designed with Crime Prevention through Environmental Design in mind, with adequate sight lines, clearly defined outdoor

spaces for groups, visual continuity, and active community spaces that place "eyes on the street." Visually obstructed and infrequently accessed "dead zones" would be limited, and where possible, security controlled to limit public access. Other crime prevention features would include nighttime security lighting, secured parking structures, controlled building access, and pedestrian security gates. These preventative and proactive security measures would decrease the amount of service calls the LAPD would receive due to project operation. The project design features, as well as the project's contribution to the General Fund, would help offset the project-related increase in demand for police services. Additionally, LAPD Chief of Police Michel R. Moore stated the LAPD "do[es] not anticipate that this project will require construction of a new police station" (LAPD 2021; Appendix H).

Emergency Access and Response Times

The project would introduce new uses to the project site, which would generate additional traffic in the vicinity. As such, project-related traffic would have the potential to increase emergency vehicle response times to the project site and surrounding properties due to additional traffic congestion. However, as described in Section 2, *Project Description*, vehicular access, including emergency access to the project site and surroundings, would continue to be provided via Santa Cruz Street, Palos Verdes Street, Beacon Street, Harbor Boulevard, 1st Street, 2nd Street, 3rd Street, Mesa Street, Centre Street, and O'Farrell Street. These streets would provide a variety of routes for police emergency responders to access the project site and surroundings. In addition, the project would be designed and constructed in accordance with LAMC requirements to ensure proper emergency access and would not include the installation of barriers (e.g., perimeter fencing, fixed bollards) that could impede emergency access on or in the vicinity of the project site. In addition, in accordance with CVC Section 21806, drivers of police emergency vehicles can avoid traffic by using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, project operation would not result in substantial impacts to emergency access or response times.

Based on the above analysis, project operation would not necessitate the provision of new or physically altered police facilities, the construction of which would cause significant environmental impacts, to maintain LAPD's capability to serve the project site. Thus, impacts to police protection services would be less than significant.

Mitigation Measures

Project-level impacts to police protection would be less than significant. Therefore, no mitigation measures are required.

Significance After Mitigation

Project-level impacts to police protection were determined to be less than significant without mitigation.

4.11.2.4 Cumulative Impacts

Cumulative growth near the proposed project site includes specific known development projects and general ambient growth. A total of 12 cumulative projects have been identified in the vicinity of the proposed project site, as listed in Section 3.4, *Cumulative Development*. The 12 cumulative projects considered within the vicinity of the proposed project anticipate adding approximately 1,508 residential units, resulting in approximately 3,649 new residents in the Harbor Division service area. The increase in development and service populations from the proposed project, cumulative projects,

and other future development in the San Pedro CPA would result in a cumulative increase in the demand for police protection. Cumulative impacts to police protection due to construction and operation of cumulative development are discussed further below.

Construction

In general, impacts to LAPD services and facilities during the construction of each cumulative project would be addressed as part of each cumulative project's development review process conducted by the City. Should the proposed project's construction occur concurrently with cumulative projects in proximity to the project site, specific coordination among these multiple construction sites would be required and implemented through the proposed project's construction management plan (as required by PDF T-1), to be developed in consultation with LADOT, which would ensure that emergency access and traffic flow are maintained on adjacent rights-of-way. In addition, each cumulative project would implement similar design and security features during construction, such as construction management plans, and would be subject to the City's routine construction permitting process, which requires security measures are implemented during construction, similar to those included as PDF POL-1 and PDF POL-2. Furthermore, the project vicinity and general San Pedro CPA are urbanized areas, and it is assumed that each of the cumulative projects identified, as well as other future development within the San Pedro CPA would likewise be serviced by one or more existing police stations. Finally, the proposed project in and of itself would not cause a significant impact to police protection services during construction. Therefore, cumulative impacts on police protection during construction would be less than significant.

Operation

The proposed project combined with cumulative development would result in a net increase of 6,364 residents in the LAPD Harbor Community Division, as well as a reduction of 486 employees. Cumulative development would decrease the officer-to-resident ratio from approximately 1.54 per 1,000 residents to 1.49 per 1,000 residents, or by approximately 3 percent. Increased development within the Harbor Community Division would result in incrementally increased demand for LAPD services. In accordance with the police protection-related goals, objectives, and policies set forth in the Framework Element, as discussed in the regulatory framework above, the LAPD would also continue to monitor population growth and land development throughout the city and identify additional resource needs, including staffing, equipment, vehicles, and possibly station expansions or new stations that may become necessary to achieve the desired level of service. The proposed project, as well as the cumulative projects and other future development projects in the San Pedro CPA, would generate revenues to the City's General Fund (in the form of property taxes, sales revenue, etc.) that could be applied toward the provision of new facilities and related staffing, as deemed appropriate by the City.

As the project vicinity and general San Pedro CPA are located within an urbanized area, it is assumed that each of the cumulative projects identified, as well as other future development within the San Pedro CPA, would likewise be serviced by one or more existing police stations. As discussed above, the proposed project is not anticipated to substantially affect existing emergency response in the LAPD Harbor Community Division.

With regard to cumulative impacts on police protection, consistent with the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police protection services is the responsibility of the City. Through the City's regular budgeting efforts, LAPD's resource needs, including staffing, equipment, and possibly station expansions or new station

construction, would be identified and allocated according to the priorities at the time. At this time, LAPD has not identified that it will be constructing a new station in the area and has concluded that the proposed project will not result in the need for new or altered police facilities (LAPD 2021). If LAPD determines that new facilities are necessary at some point in the future, 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 less than 1 acre in size; and (3) could qualify for a categorical exemption under CEQA Guidelines Section 15301 or 15332 or a Mitigated Negative Declaration and, as such, would not be expected to result in significant impacts. Therefore, development of a station at this scale is unlikely to result in significant unmitigated impacts, and projects involving the construction or expansion of a police station would be addressed independently pursuant to CEQA.

Based on the above, the proposed project and cumulative development would not result in significant cumulative impacts associated with the provision of new or physically altered police facilities, the construction of which would cause significant environmental impacts, to maintain service. As such, cumulative impacts related to police protection would be less than significant.

4.11.3 Schools

4.11.3.1 Environmental Setting

The Los Angeles Unified School District (LAUSD) serves an area totaling 710 square miles, including most of Los Angeles and all or portions of 26 cities and unincorporated areas of Los Angeles County (LAUSD 2022a). LAUSD enrolled 502,850 students in pre-Kindergarten through 12th grade for the 2022-2023 school year, 23,094 students in other types of classes, and 27,740 students in adult education courses, for 565,479 total students served in the district. LAUSD includes 18 primary schools, 435 elementary schools, 77 middle schools, 86 high schools, 59 option schools, 67 magnet schools, 30 multi-level schools, 12 special education schools, two home/hospital schools, 264 Kindergarten-12 magnet centers (i.e., magnet schools within regular campuses), 224 charter schools, and 164 other schools and centers (LAUSD 2022a). As of June 2022, the LAUSD employed 74,000 personnel, with 24,769 teachers, 3,025 administrators, 30,459 classified personnel, 6,305 other certificated support personnel, 2,199 teacher assistants, and 7,243 substitutes. The LAUSD Fiscal Year 2022-2023 total budget was around $12.6 billion (LAUSD 2022a). Outside LAUSD, students may also attend non-LAUSD schools, including public charter schools, magnet schools, pilot schools, and private schools.

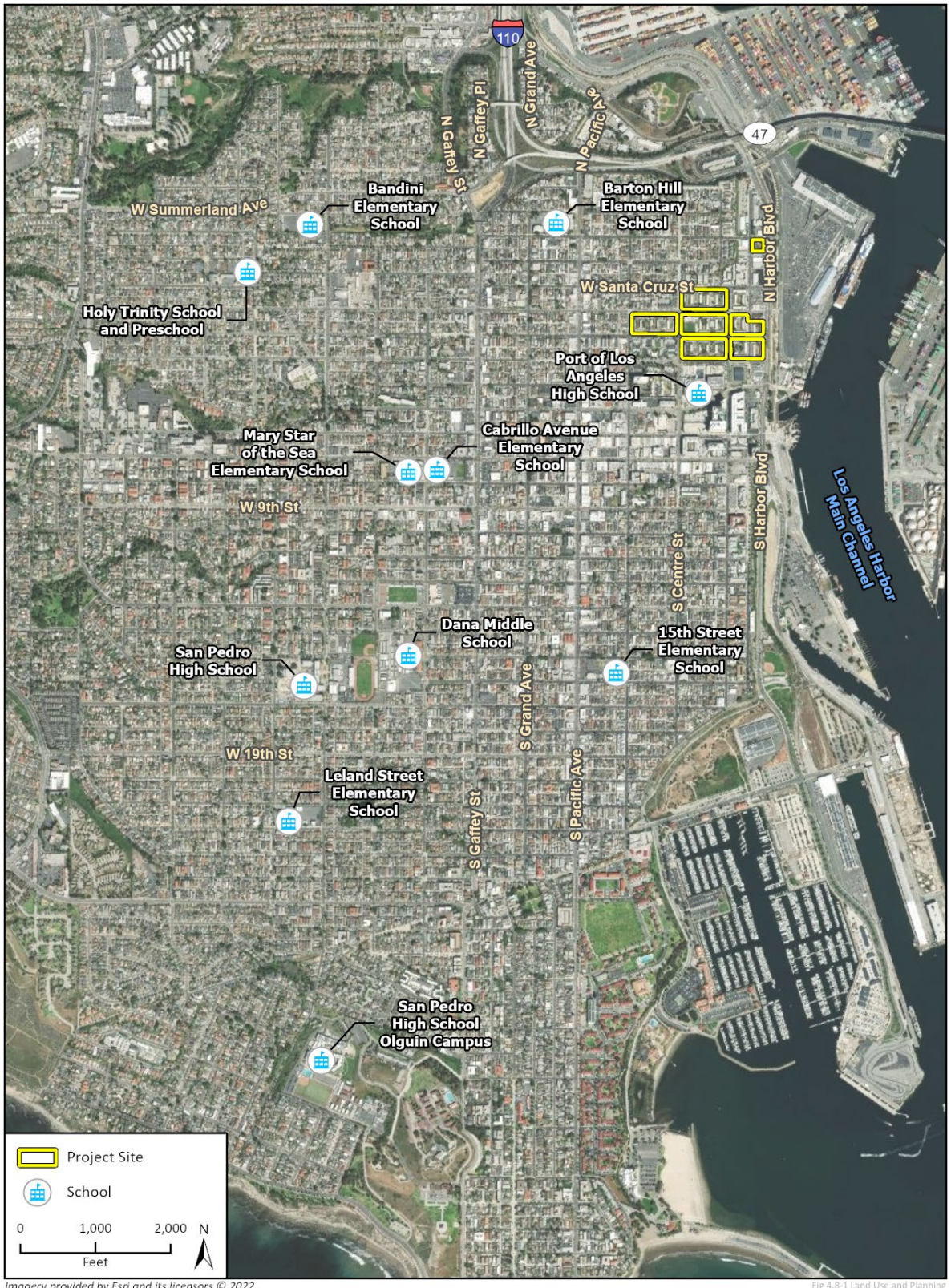
LAUSD is divided into six local districts (Central, East, Northeast, Northwest, South, and West). The project site is located on the South Local District, San Pedro Community of Schools (LAUSD 2022b). The San Pedro Community of Schools consists of 12 elementary schools, two middle schools, two high schools, and one special education center (San Pedro Community of Schools 2023). The LAUSD schools that would serve the proposed project are Barton Hill Elementary School and Maritime Science, Technology, Engineering, Arts, and Mathematics (STEAM) Magnet located approximately 0.6 mile north of the project site, Dana Middle School and STEAM Magnet located approximately 1.0 mile southwest of the project site, and San Pedro High School located approximately 1.2 miles southwest of the project site (LAUSD 2022c; see Appendix H). The Port of Los Angeles also operates a Charter High School one block south of the OSP Specific Plan Site, called the Port of Los Angeles High School. In addition, Mary Star of the Sea Elementary School and Holy Trinity School and Preschool are private schools within a 1.0-mile radius of the project site. This analysis is based on LAUSD school facilities that would serve the project site. While the nearby charter and private schools are not included in

the analysis below, these schools could also potentially assist in serving any new demand for schools. Figure 4.11-3 shows the locations of schools nearby the project site.

According to LAUSD, available seating capacity is based on resident enrollment (i.e., the number of students living in a school's attendance area who are eligible to attend the resident school associated with the student's address) compared to the respective school's current capacity, regardless of the actual enrollment. The resident enrollment is a depiction of the enrollment pool of students that resident schools must be prepared to enroll and serve. Actual enrollment is based on the number of students enrolled, whether they live inside or outside the attendance boundary.

Barton Hill Elementary School and Maritime STEAM Magnet has a seating capacity of 600 students and a current enrollment of 420 students, Dana Middle School and STEAM Magnet has a seating capacity of 1,551 students and a current enrollment of 1,460 students, and San Pedro High School has a seating capacity of 2,856 students and a current enrollment of 2,856 students (LAUSD 2022c; see Appendix H). Per LAUSD methodology, available seating is determined by subtracting its current resident enrollment from its current capacity. A positive result indicates that the school has a surplus of seats (which means the school is operating within capacity and has seating availability), while a negative result indicates that the school has a potential shortage of seats (which means the school is overcrowded). According to LAUSD, a school is considered overcrowded if the school has a potential seating shortage and/or there is a seating overage of less than or equal to a "safety margin" of 20 seats. Because LAUSD's methodology relies on resident enrollment rather than actual enrollment, overcrowded status refers to a potential seating shortage if all students who live in the school's attendance area attended that school. Based on the information provided by LAUSD, Barton Hill Elementary School and Maritime STEAM Magnet and Dana Middle School and STEAM Magnet are currently operating within capacity, while San Pedro High School is overcrowded. LAUSD does not currently have plans to expand the existing schools or develop new schools in the project area (LAUSD 2022c; see Appendix H).

Figure 4.11-3 Schools in the Project Area



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Additional data provided by Los Angeles County, 2022.

Fig 4.8-1 Land Use and Planning
Fig 4.11-3 Schools in the Project Area

4.11.3.2 Regulatory Setting

a. State Laws and Regulations

California Education Code

Educational services and school facilities for the project are subject to the rules and regulations of the California Education Code, the California Department of Education (CDE), and governance of the State Board of Education (SBE) (Gov. Code Section 33000, et seq.). The CDE is the government agency responsible for public education throughout the state. With the State Superintendent of Public Instruction, the CDE is responsible for enforcing education law and regulations and for continuing to reform and improve public elementary school, secondary school, childcare programs, adult education, and preschool programs. The CDE oversees funding, and student testing and achievement levels for all State schools. A sector of the CDE, the SBE is the 11-member governing and policymaking body of the CDE that sets Kindergarten through 12th Grade (K–12) education policy in the areas of standards, instructional materials, assessment, and accountability. The State also provides funding through a combination of sales and income taxes. Pursuant to Proposition 98, the State is also responsible for the allocation of educational funds acquired from property taxes. Furthermore, the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities.

Senate Bill 50

The Leroy F. Greene School Facilities Act of 1998 (known as the Greene Act), enacted in 1998, is a program for funding school facilities largely based on matching funds. For new school construction, grants provide funding on a 50/50 State and local match basis. For school modernization, grants provide funding on a 60/40 State and local match basis. Districts that are unable to provide some, or all, of the local match requirement and can meet the financial hardship provisions may be eligible for additional State funding (State of California Office of Public School Construction 2019).

The Greene Act permits the local district to levy a fee, charge, dedication, or other requirement against any development project within its boundaries, for the purpose of funding the construction or reconstruction of school facilities. The Act also sets a maximum level of fees a developer may be required to pay. Pursuant to Government Code Section 65996, the payment of these fees by a developer serves to mitigate all potential impacts on school facilities that may result from implementation of a project to a less than significant level.

Open Enrollment Policy

The Open Enrollment Policy (Cal. Educ. Code Sections 48350, et seq.) is a State-mandated policy that enables students residing within the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated “open enrollment” seats. Open enrollment seats are granted through an application process that is completed before the school year begins. Under the Open Enrollment Policy, students living in a particular school’s attendance area are not displaced by a student requesting an open enrollment transfer to that school.

Class Size Reduction Kindergarten-University Public Education Facilities Bond Act of 1998

Proposition 1A, the Class Size Reduction Kindergarten-University Public Education Facilities Bond Act of 1998 (Ed. Code, Section 100400–100405), is a school construction funding measure that was approved by the voters on the November 3, 1998 ballot. This Act created the School Facility Program where eligible school districts may obtain state bond funds.

b. Regional and Local Laws and Regulations

Los Angeles Unified School District

As indicated above, the State is primarily responsible for the funding and structure of the local school districts, and in this case, LAUSD. As LAUSD provides education to students in many cities and county areas, in addition to the city of Los Angeles, its oversight is largely a district-level issue. Public schools operate under the policy direction of elected governing district school boards (elected from the local area), as well as by local propositions which directly impact the funding of facility construction and maintenance. Pursuant to the Greene Act, LAUSD collects developer fees for new construction within its boundaries. The LAUSD School Facilities Needs Analysis has been prepared to support the school district's levy of the fees authorized by Section 17620 of the California Education Code. Payment of these fees would be mandatory for the project and would fully minimize any impact upon school services generated by the project (LAUSD 2020).

LAUSD Strategic Plan 2022-2026

The LAUSD Strategic Plan 2022–2026 (Strategic Plan) represents the LAUSD's framework towards providing LAUSD students with educational opportunities. The Strategic Plan is based upon four goals which outline student outcomes LAUSD expects to meet by 2026. The goals are as follows:

- The percentage of students in a graduating 9th-12th grade cohort demonstrating college and career readiness with a "C" or better on University of California/California State University A-G approved courses will increase to 70 percent by June 2026.
- In order to build a strong foundation for literacy, move 3rd grade students, on average, 30 points closer to proficiency on Smarter Balanced Assessment English Language Arts/Literacy from 2022 to 2026.
- In order to improve Algebra I pass rates, move students, on average, 40 points closer to proficiency on Smarter Balanced Assessment Mathematics from 2022 to 2026 in Grades 3-5 and 6-8.
- At each school level, students in elementary, middle school, and high school will demonstrate growth of 8 percent in each of the social-emotional learning (SEL) competencies of growth mindset, self-efficacy, self-management, and social awareness, by June 2026 as preliminarily measured by the School Experience Survey with full transition to a portfolio rubric to be implemented by the 2023-24 school year.

The Strategic Plan identifies five main pillars: (1) Academic Excellence; (2) Joy and Wellness; (3) Engagement and Collaboration; (4) Operational Effectiveness; and (5) Investing in Staff, with specific initiatives to fulfill the pillars (LAUSD 2022d).

LAUSD Choices Program

LAUSD provides education choices including magnet and permits with transportation programs to students residing within the LAUSD boundaries. Students interested in enrolling in LAUSD magnet and permits with transportation programs are required to apply through LAUSD eChoices. Magnet schools under the Choice Program include business, communication arts, center for enriched studies, gifted/highly gifted/high ability, liberal arts, magnet schools' assistance program, public service, science, technology, engineering and math, and visual and performing arts.

City of Los Angeles General Plan Framework Element

Chapter 9, Infrastructure and Public Services, of the Framework Element includes goals, objectives, and policies applicable to public schools; these are summarized in Table 4.11-8.

Table 4.11-8 Applicable School-Related Goals, Objectives, and Policies from the Infrastructure and Public Services Chapter of the Framework Element

Goal/Objective/Policy	Description
Goal 9N	Public schools that provide a quality education for all of the city's children, including those with special needs, and adequate school facilities to serve every neighborhood in the city so that students have an opportunity to attend school in their neighborhoods.
Objective 9.31	Work constructively with the Los Angeles Unified School District to monitor and forecast school service demand based upon actual and predicted growth.
Policy 9.31.1	Participate in the development of, and share demographic information about, population estimates.
Objective 9.32	Work constructively with Los Angeles Unified School District to promote the siting and construction of adequate school facilities phased with growth.
Policy 9.32.1	Work with the Los Angeles Unified School District to ensure that school facilities and programs are expanded commensurate with the city's population growth and development.
Policy 9.32.2	Explore creative alternatives for providing new school sites in the city, where appropriate.
Policy 9.32.3	Work with LAUSD to explore incentives and funding mechanisms to provide school facilities in areas where there is a deficiency in classroom seats.
Objective 9.33	Maximize the use of local schools for community use and local open space and parks for school use.
Policy 9.33.1	Encourage a program of decision-making at the local school level to provide access to school facilities by neighborhood organizations.
Policy 9.33.2	Develop a strategy to site community facilities (libraries, parks, schools, and auditoriums) together.

Source: City of Los Angeles 2001

San Pedro Community Plan

The project site is within the boundary of the San Pedro Community Plan. Table 4.11-9 shows relevant goals and policies of the San Pedro Community Plan related to schools and education.

Table 4.11-9 School-Related Goals and Policies from the San Pedro Community Plan

Goal/Objective/Policy	Description
Goal CF4	Provision of appropriate locations and adequate facilities for public schools to serve the needs of current and future residents in the community.
Policy CF4.1	**Accessible public schools.** Encourage siting of public middle schools and high schools within or adjacent to public transit systems, and Community and Regional Centers to maximize accessibility.
Policy CF4.2	**Compatible school sites.** Encourage compatibility between school locations, site layouts, architectural designs, and local neighborhood character.
Policy CF4.3	**Neighborhood schools.** Work with LAUSD to promote the siting and construction of public school facilities that are phased to accommodate anticipated population growth and that are located in areas that serve neighborhoods.
Policy CF4.4	**Joint use of facilities with LAUSD.** Coordinate with LAUSD to explore creative alternatives that integrate uses for recreation, local open space, and neighborhood use, and encourage public schools to site jointly with other community facilities, such as libraries, parks, and auditoriums.

Source: City of Los Angeles 2017

4.11.3.3 Environmental Impacts

a. Significance Thresholds and Methodology

Significance Thresholds

Impacts related to schools would be potentially significant if they exceed the following significance criteria in accordance with Appendix G of the CEQA Guidelines:

1. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or 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.

For this analysis, the Appendix G thresholds listed above are relied upon. The analysis utilizes the following factors in consideration identified in the Thresholds Guide, as appropriate, to assist in answering the Appendix G threshold questions.

The Thresholds Guide identifies the following criteria to evaluate impacts to schools:

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

Methodology

The analysis of enrollment effects on schools is based in part on the ability of LAUSD school facilities and services to accommodate the potential increase in students generated from development of the project. The analysis estimates the number of students that would be generated by the project using LAUSD student generation rates and considers whether LAUSD school facilities that serve the project site would have sufficient available capacity to accommodate these students at the time of project buildout. LAUSD student generation rates were derived from the 2022 LAUSD Developer Fee Justification Study (LAUSD 2022e). School planning for future enrollments is completed by the LAUSD during five-year intervals and is based on the estimated future resident enrollment (i.e., estimated number of eligible resident students). Current and projected enrollments/capacities use the 2022-2023 school year as a baseline.

The analysis addresses three levels of education facilities operated by LAUSD (i.e., elementary, middle, and high schools), and is centered on those schools that serve the project site. This analysis does not consider LAUSD options that would allow students generated by the project to enroll at other LAUSD schools located away from their attendance area, or students who may enroll in private schools or participate in homeschooling. In any case, students who opt to enroll within districts other than their home districts are required to obtain inter-district permits to ensure that existing facilities of the incoming schools would not suffer impacts due to additional enrollment. Furthermore, this analysis is conservative as it does not account for other schools, such as charter schools and magnet schools in the project area that could also serve project residence. It also considers State regulations (i.e., SB 50) and development fees as a mechanism for providing school facilities and addressing school impacts of the project.

Impact PS-3 PROJECT DESIGN FEATURES

No specific design features are proposed with regard to schools. However, as discussed in Section 4.13, *Transportation*, and duplicated above under Section 4.11.1, *Fire Protection*, pursuant to PDF T-1, the project would implement a construction management plan that would include provisions for construction hours, haul routes, lane closures and detours, and construction parking that would limit construction impacts to nearby schools.

Impact PS-4 PROJECT IMPACTS AND MITIGATION MEASURES

Threshold 1:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service or other performance objectives for public schools?

Impact PS-5 IMPLEMENTATION OF THE PROPOSED PROJECT WOULD INCREMENTALLY INCREASE THE ENROLLMENT OF STUDENTS IN LOCAL SCHOOLS. NONETHELESS, THE PROJECT APPLICANT WOULD BE REQUIRED TO PAY DEVELOPMENT FEES FOR SCHOOLS TO LAUSD, WHICH WOULD OFFSET THE POTENTIAL IMPACT OF ADDITIONAL STUDENT ENROLLMENT. THEREFORE, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The proposed project includes two development scenarios (see Section 2, *Project Description*) that would involve phasing the construction in two different development patterns on the OSP Specific Plan Site. Under Scenario A, the densest development would be located in Phases 2 and 3, whereas under Scenario B, development would be densest in Phases 1 and 2 (refer to Figure 2-4 in Section 2,

Project Description, for a map of the Phases). Under both scenarios, the footprint of development would be identical and the amount of residential and nonresidential development would be the same. Development at the 327 Harbor Site would be identical under both development scenarios and would include construction of 47 affordable housing units. Accordingly, this analysis applies to both Scenario A and Scenario B.

Construction

The project would generate temporary jobs associated with construction of the project. However, due to the employment patterns of construction workers in southern California and the operation of the market for construction labor, construction workers are not likely to relocate their households because of the construction job opportunities presented by the project. The construction employment generated by the project would not result in an increase in the resident population of the project site or a corresponding increase in student generation from the project during construction. Therefore, construction of the project would not increase demand for schools in the vicinity of the project site.

The nearest school to the project site is the Port of Los Angeles High School, which is located immediately south of the OSP Specific Plan Site, across 3rd Street. All other nearby schools are located more than 0.5 mile from the project site, as described in Section 4.11.3.1, *Environmental Setting*. Project construction activities, staging areas, and hauling would comply with the Construction Management Plan, as specified by PDF T-1, which would include provisions to limit construction impacts to nearby uses, including schools. Construction activities would not substantially interfere with Port of Los Angeles High School or other nearby school operations in a manner that would require new or physically altered school facilities. Therefore, project construction would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities or the need for a new or physically altered school facilities, the construction of which would cause significant environmental impacts, to maintain acceptable service ratios or other performance objectives for schools. As such, construction-related impacts on schools would be less than significant.

Operation

The proposed project would involve the phased demolition of 478 residential units and associated facilities on the OSP Specific Plan Site, and would introduce 1,553 new residential units, 45,000 sf of commercial uses, and 85,000 sf of Neighborhood Serving Uses to the OSP Specific Plan Site. On the 327 Harbor Site, 47 residential units would be constructed. Therefore, the project would result in a net increase of 1,122 residential units on the project site. In addition, new jobs associated with the Neighborhood Serving Uses and commercial uses would result in approximately 314 employees on the OSP Specific Plan Site (refer to Section 4.10, *Population and Housing*, for a detailed analysis of the potential number of residents and employees associated with buildout of the project).

Potential students associated with the construction of 1,122 net new residential dwelling units and the retail and Neighborhood Serving Uses component, are reflected in Table 4.11-10.

Table 4.11-10 Estimated Net Number of Students Generated by the Project

			Students Generated			
Land use	**Unit**	**Student Generation Factor**	**Elementary (K-6)**	**Middle School (7-8)**	**High School (9-12)**	**Total**
Residential	1,122 du	1953 students/du (elementary school), 0.0538 students/du (middle school), and 0.1071 students/du (high school)	219	60	120	399
Commercial Retail and Neighborhood Serving Uses[1]	314 employees	0.1724 students/employee	30	8	16	54
Total Project Student Generation			**249**	**68**	**136**	**453**

du = dwelling unit

[1] Refer to Section 4.10, *Population and Housing*, for information regarding the estimated employee generation for the proposed project. Since the LAUSD School Fee Justification Study does not specify which grade levels students in for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the project residential generation factors (i.e., approximately 55 percent elementary school, 15 percent middle school, and 30 percent high school).

Source: LAUSD 2022e

The number of project-generated students who would attend LAUSD schools serving the project site would likely be less than the estimate presented above because this analysis does not include LAUSD options that would allow students generated by the project to enroll at other LAUSD schools located away from their home attendance area, or students who may enroll in private schools or participate in homeschooling. This analysis is also conservative in that it assumes that none of the future project residents would already have students attending schools in the district boundaries. Other factors that affect enrollment in LAUSD schools near the project site include the following:

- Open enrollment that enables students anywhere within the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated open enrollment seats
- Magnet schools and centers that are open to qualified students in LAUSD
- The Permits with Transportation Program that allows students to continue to go to schools in the same feeder pattern of the school in which they were enrolled from elementary through high school, with transportation to those schools from wherever they live within the District
- Intra-district parent employment-related transfer permits that allow students to enroll in the school that serves the attendance area where the student's parent is regularly employed if there is adequate capacity available at the school
- Sibling permits that enable students to enroll in the school where sibling is already enrolled
- Childcare permits that allow students to enroll in a school that serves the attendance area where a younger sibling is cared for every day after school hours by a known childcare agency, private organization, or verifiable childcare provider

The primary schools serving the project would be Barton Hill Elementary School and Maritime STEAM Magnet, Dana Middle School and STEAM Magnet, and San Pedro High School. The project would

generate approximately 453 net new students, comprising 249 elementary school students (grades K-6), 68 middle school students (grades 6-8), and 136 high school students (grades 9-12). Based on existing data enrollment and capacity data from LAUSD, Barton Hill Elementary School and Maritime STEAM Magnet and San Pedro High School would be impacted as follows:

- Barton Hill Elementary School and Maritime STEAM Magnet would have a shortage of 69 seats (existing excess capacity of 180 seats minus the project-generated 249 seats).
- San Pedro High School is currently at full capacity and thus would have a shortage of 136 seats.

Dana Middle School and STEAM Magnet would have adequate capacity to accommodate new students that could be generated by the project, and would be impacted as follows:

- Dana Middle School and STEAM Magnet would have a surplus of 23 seats (existing excess capacity of 91 seats minus the project-generated 68 seats).

LAUSD does not have a capital improvement plan to address future facility needs and has not established a threshold for provision of these new facilities. LAUSD may consider presenting a local bond measure to voters in the future to raise capital for facility modernization and new construction. Additionally, pursuant to SB 50, the project Applicant would be required to pay development fees to LAUSD prior to the issuance of the project's building permit. As discussed above, LAUSD collects development fees for new construction within its district boundaries. Pursuant to Government Code Section 65995(h), the payment of these fees fully reduces all project-related school impacts to less than significant levels. Therefore, payment of the applicable development school fees to the LAUSD would offset the potential impact of additional student enrollment at the schools serving the project site. Furthermore, the potential future school expansions necessary to accommodate growth would be subject to CEQA which requires that physical impact on the environment be evaluated, disclosed, and mitigated when feasible.

Based on the above, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities or the need for new or physically altered school facilities, the construction of which would cause significant environmental impacts, to maintain acceptable service ratios or other performance objectives for schools. As such, operational impacts to schools would be less than significant.

Mitigation Measures

Project-level impacts to schools would be less than significant. Therefore, no mitigation measures are required.

Significance After Mitigation

Project-level impacts to schools were determined to be less than significant without mitigation.

4.11.3.4 Cumulative Impacts

Cumulative growth near the proposed project site includes specific known development projects and general ambient growth. A total of 12 cumulative projects have been identified within a 0.5-mile radius of the proposed project site, as listed in Section 3.4, *Cumulative Development*. These projects are located within the attendance boundaries of at least one of the schools serving the project site. The 12 cumulative projects considered within the vicinity of the proposed project anticipate adding approximately 1,508 residential units, as well as a variety of non-residential uses. The increase in development and service populations from the proposed project, cumulative projects, and other future development in the San Pedro CPA would result in a cumulative increase in the demand for school services. Cumulative impacts to school services due to construction and operation of cumulative development are discussed further below.

Construction

Similar to the proposed project, construction of cumulative projects would not be anticipated to result in increased student enrollment in the LAUSD schools serving the San Pedro area due to the temporary nature of construction activities and employment patterns of construction workers in southern California. There are schools located in the vicinity of some of the cumulative projects that could be affected by construction of those projects. However, each of the cumulative projects would be required to prepare a Construction Management Plan that would ensure construction activities and road/sidewalk closures and detours would be planned to minimize impacts to Safe Routes to Schools and other operational aspects of nearby schools. Therefore, cumulative impacts on schools during construction would be less than significant.

Operation

As indicated above, the proposed project would generate a net total of 453 net new students, comprising 249 elementary school students (grades K-6), 68 middle school students (grades 6-8), and 136 high school students (grades 9-12). As shown in Section 4.10, *Population and Housing*, cumulative development would result in 3,108 new dwelling units and a reduction of 486 employees. Table 4.11-11 illustrates the combined number of students generated by the proposed project and the cumulative projects.

Table 4.11-11 Estimated Net Number of Students Generated by Cumulative Development

Land use	Unit	Student Generation Factor	Students Generated			
			Elementary (K-6)	Middle School (7-8)	High School (9-12)	Total
Cumulative Projects						
Residential[1]	3,108 du	0.1953 students/du (elementary school), 0.0538 students/du (middle school), and 0.1071 students/du (high school)	607	167	333	1,107
Non-residential[1]	(486) employees	0.1724 students/employee	(46)	(13)	(25)	(84)
Total Cumulative Projects Student Generation			**561**	**154**	**308**	**1,023**
Proposed Project Net Student Generation			249	68	136	453
Cumulative Projects Plus Proposed Project Student Generation			**810**	**222**	**444**	**1,476**

du = dwelling unit; ( ) = negative value

[1] Refer to Section 4.10, *Population and Housing*, for information regarding the estimated employee generation for the cumulative development scenario. Since the LAUSD School Fee Justification Study does not specify which grade levels students in for non-residential land uses, the students generated by the non-residential uses are assumed to be divided among the elementary school, middle school, and high school levels at the same distribution ratio observed for the project residential generation factors (i.e., approximately 55 percent elementary school, 15 percent middle school, and 30 percent high school).

Source: LAUSD 2022e

The proposed project combined with cumulative projects would result in a net additional 1,476 students. This student population would be comprised of 810 elementary school students (grades K-6), 222 middle school students (grades 6-8), and 444 high school students (grades 9-12). With regard to projected future capacity data from LAUSD, Barton Hill Elementary School and Maritime STEAM Magnet would have a shortage of 630 seats, Dana Middle School and STEAM Magnet would have a shortage of 131 seats, and San Pedro High School would have a shortage of 444 seats. It is noted that there are a number of other LAUSD elementary schools in the vicinity of the project site, including Cabrillo Avenue Elementary, 15th Street Elementary, and Leland Street Elementary, which may be the local elementary school for some of the cumulative projects. Therefore, impacts to Barton Hill Elementary School and Maritime STEAM magnet are likely overestimated.

Based on the above analysis, the proposed project, in combination with the cumulative projects, could require new or expanded school facilities. However, LAUSD continually monitors enrollment numbers at all schools within the District, and seating shortages can be addressed through changes in attendance boundaries and new/expanded school facilities. Provided that the location and operational characteristics of any new or expanded school facilities have not yet been identified by

LAUSD to specifically serve the proposed project and the cumulative projects, it would be speculative to determine how school capacity shortages would be addressed, including where and what type of expanded or new facilities may be provided. Therefore, at such time as the need for expanded or new school facilities are identified by LAUSD, the environmental impacts associated with construction of those facilities would be evaluated by LAUSD under CEQA as a separate project, independent of the proposed project. As previously discussed, LAUSD has determined that no new schools are planned in the project site's attendance boundaries.

Similar to the proposed project, future development, including the cumulative projects, would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits pursuant to SB 50. As discussed above, LAUSD collects development fees for new construction within its district boundaries. Pursuant to Government Code Section 65995(h), the payment of these fees would be considered full and complete reduction of all school impacts generated by the proposed project and cumulative projects. Therefore, the proposed project and cumulative projects would not result in significant cumulative impacts associated with the provision of new or physically altered school facilities, or need for new or physically altered school facilities, the construction of which would cause significant environmental impacts, to maintain service. As such, cumulative impacts to schools would be less than significant.

4.11.4 Libraries

4.11.4.1 Environmental Setting

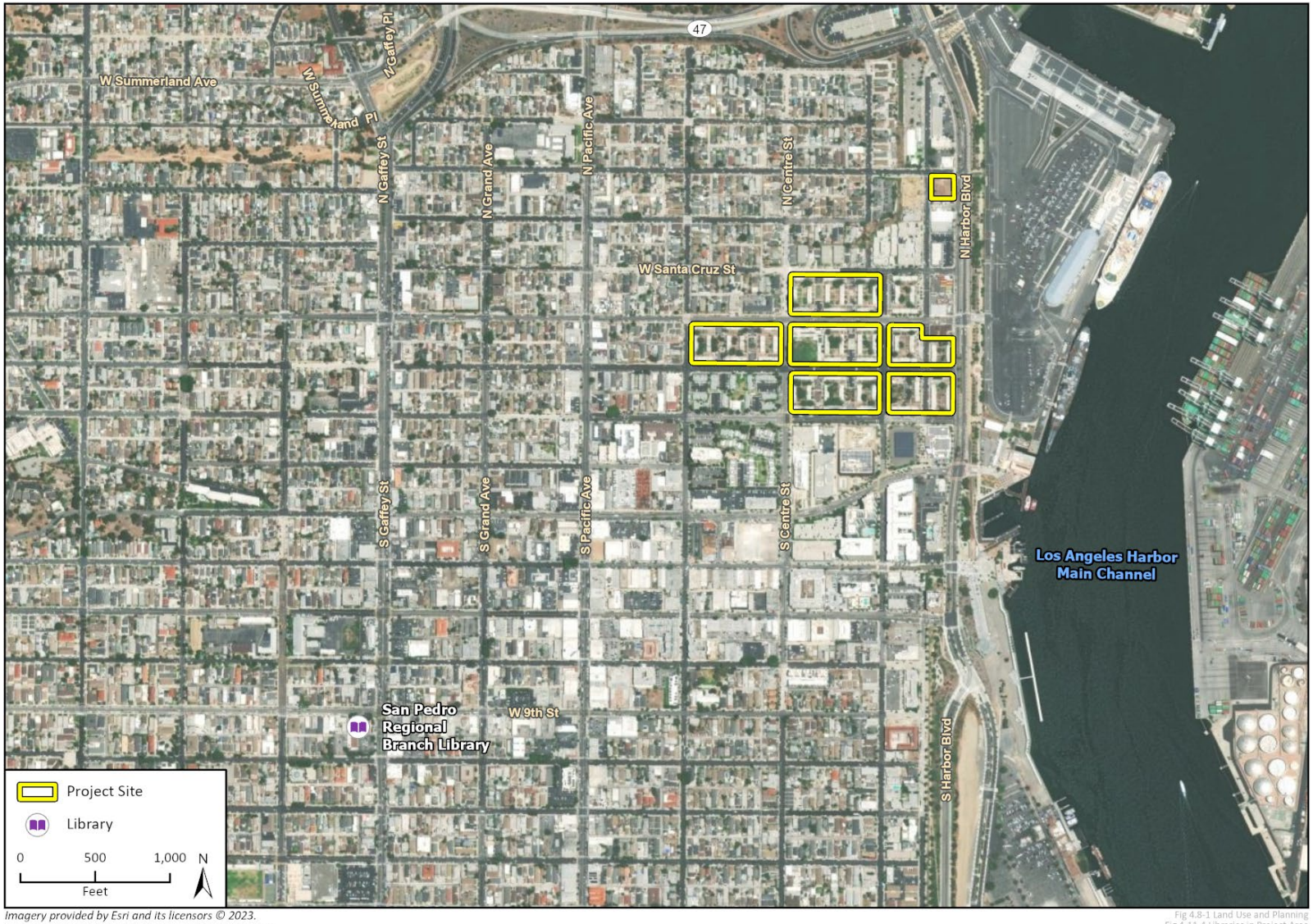
The Los Angeles Public Library (LAPL) provides library services to the greater Los Angeles area. LAPL operates the Central Library, as well as 72 community branches across the city. The LAPL collection houses more than 7.2 million items, including digital and print items that are borrowed more than 16 million times a year. The library system also offers an array of other services to the Los Angeles community, such as homework help, story-time, professional development services, lecture series, music and arts events, and a summer reading series for kids. In total, LAPL offers more than 18,000 public programs a year (LAPL 2020).

LAPL is a member of the Southern California Library Cooperative (SCLC). SCLC is an association of 40 independent cities, county, and special district public libraries located in Los Angeles and Ventura counties that shares resources to improve library service to the residents of all participating jurisdictions. Participation in this program enables mutual loan privileges and allows member libraries to receive compensation for such use (SCLC 2023).

LAPL members have access to materials housed at libraries throughout the LAPL system through the library loan program and can pick up materials at whichever library is most convenient. Every branch library offers free Wi-Fi and use of computer workstations that provide Internet access; the ability to search the LAPL online catalog; access to subscription databases, word processing and language learning tools, and historic document and photograph collections; and access to specially designed websites for children, teens, and Spanish speakers.

Figure 4.11-4 shows the location of the San Pedro Regional Branch Library, which is the branch that would serve the project. The San Pedro Regional Branch Library is located approximately 1.1 miles southwest of the project site. As indicated in written correspondence provided by LAPL and included in Appendix H of this Draft EIR/EIS, the San Pedro Regional Branch is approximately 20,000 square feet in size and employs 12 full-time equivalent staff. The branch includes a collection of approximately 70,000 items and offers internet access and free Wi-Fi to patrons.

Figure 4.11-4 Library Branch in the Project Area



Imagery provided by Esri and its licensors © 2023.
Additional data provided by Los Angeles County, 2022.

Fig 4.8-1 Land Use and Planning
Fig 4.11-4 Libraries in Project Area

Programs featured at the branch include, but are not limited to, the following: reading programs (including story time for young children, STAR reading tutoring, and BARK! [children reading to live dogs]), weekly programs for children and teens (including after school homework tutoring), quarterly programming for adults (including programs on health, financial literacy, English tutoring, and obtaining citizenship), and computer classes. The branch currently serves a population of approximately 82,604 people (LAPL 2022; see Appendix H).

4.11.4.2 Regulatory Setting

a. Local Laws and Regulations

City of Los Angeles General Plan Framework

The City's General Plan Framework Element 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).

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 LAPL 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 percent of the library infrastructure was replaced in a 15-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 (LAPL 2007). 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 4.11-12.

Table 4.11-12 LAPL Branch Facilities Plan – Library Building Size Standards

Library Type	Population Served	Size of Facility (sf)
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

sf = square feet; < = less than; > = greater than; ≤ = less than or equal to

Note: 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.

Source: LAPL 2007

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.

Los Angeles Public Library Strategic Plan 2015–2020

The Los Angeles Public Library Strategic Plan 2015–2020 (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 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 offered by LAPL, referred to as Key Activities in the Plan (LAPL 2015).

San Pedro Community Plan

The project site is within the San Pedro Community Plan. Table 4.11-13 lists goals and policies in the San Pedro Community Plan applicable to libraries.

Table 4.11-13 San Pedro Community Plan Library Goals and Policies

Goal/Policy	Description
Goal CF3	Adequate library facilities and services that meet the needs of residents and business employees for self-learning, and cultural and academic enrichment.
Policy CF3.1	**Adequate library facilities and service.** Support construction of new libraries and the retention, rehabilitation and expansion of existing library sites as required to meet the changing needs of the community.
Policy CF3.2	**Integrated library facilities.** Encourage new development to incorporate library facilities in commercial and office buildings, pedestrian-oriented areas, Community and Regional Centers, transit stations, and similarly accessible facilities, particularly in the western portion of San Pedro.
Policy CF3.3	**Joint-use libraries.** Continue to support joint-use opportunities when the City of Los Angeles Library Department and decision-makers review and approve new library sites.
Policy CF3.4	**Non-traditional library services.** Expand non-traditional library services, such as book mobiles and other book sharing strategies, where permanent facilities are not available or adequate.

Source: City of Los Angeles 2017

4.11.4.3 Environmental Impacts

a. Significance Thresholds and Methodology

Significance Thresholds

Impacts related to libraries would be potentially significant if they exceed the following significance criteria in accordance with Appendix G of the CEQA Guidelines:

1. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or 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 listed above are relied upon. The analysis utilizes the following factors in consideration identified in the Thresholds Guide, as appropriate, to assist in answering the Appendix G threshold questions.

The Thresholds Guide identifies the following criteria to evaluate impacts to libraries:

- The net population increase resulting from the proposed project
- The demand for library services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to library services (renovation, expansion, or addition) and the project's proportional contribution to the demand
- 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)

Methodology

The methodology used to evaluate potential library impacts includes the following: (1) identifying libraries within 2 miles of the project site that would serve the project; (2) projecting the future service population for the library that would serve the project; (3) comparing the future service population to the service population of the LAPL building size standards as set forth in the 2007 Branch Facilities Plan Criteria for New Libraries; and (4) determining whether the project's contribution to the future service population would cause the library to operate beyond its service capacity.

b. Project Design Features

The following PDF, in addition to the project amenities described in Section 2, *Project Description*, are proposed to provide services to residents, employees, and visitors of the site that would reduce impacts to library services in the area:

PDF LIB-1 Universal Wi-Fi

The proposed project will include free, publicly accessible Wi-Fi in the residential common areas and publicly accessible open space areas of the OSP Specific Plan Site. This PDF also applies to the 327 Harbor Site.

c. Project Impacts and Mitigation Measures

Threshold 1:	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?

Impact PS-6 THE PROPOSED PROJECT COULD INCREMENTALLY INCREASE THE DEMAND FOR LIBRARY SERVICES PROVIDED BY THE SAN PEDRO REGIONAL BRANCH LIBRARY. NONETHELESS, THE PROJECT INCLUDES FEATURES THAT WOULD REDUCE THE DEMAND FOR LIBRARY SERVICES AND WOULD GENERATE REVENUE TO THE CITY'S GENERAL FUND THAT COULD BE APPLIED TOWARD THE PROVISION OF NEW LIBRARY FACILITIES. THIS WOULD OFFSET THE PROJECT'S IMPACTS TO LIBRARY SERVICES. THEREFORE, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The proposed project includes two development scenarios (see Section 2, *Project Description*) that would involve phasing the construction in two different development patterns on the OSP Specific Plan Site. Under Scenario A, the densest development would be in Phases 2 and 3, whereas under Scenario B, development would be densest in Phases 1 and 2 (refer to Figure 2-4 in Section 2, *Project Description*, for a map of the Phases). Under both scenarios, the footprint of development would be identical, construction and grading activities would be the same. Development at the 327 Harbor Site would be identical under both development scenarios and would include construction of 47 affordable housing units. Accordingly, this analysis applies to both Scenario A and Scenario B.

Construction

Construction of the project would result in a temporary increase in construction workers on the project site. Due to the employment patterns of construction workers in southern California and the market for construction labor, construction workers are not likely to relocate their households to participate in project construction. Therefore, project-related construction workers would not contribute to a notable increase in the residential population within the service areas of the San Pedro Regional Branch Library. In addition, project-related construction workers would not contribute to a notable increase in an overall corresponding demand for library services in the vicinity of the project site because it is reasonable to assume that construction workers would visit libraries near their homes and not those near the project site on their way to/from work or during their lunch hours because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of the library facilities, eat lunch, and return to work. It is also unlikely that construction workers would utilize library facilities on their way to work as their workday generally begins before the library opens for service. Therefore, any increase in usage of the library by construction workers would likely be negligible.

There are no libraries located in the immediate vicinity that would be affected by construction activities occurring at the project site. The nearest library, the San Pedro Regional Branch Library, is located approximately 1.1 miles southwest of the project site and is separated by intervening development. There would be no project-related construction staging, activities, road closures, or noise at or adjacent to the San Pedro Regional Branch Library. Therefore, construction activities would not adversely affect the operations of nearby libraries.

Based on the above, project construction would not substantially increase the demand for library services for which current demands exceed the ability of the facility to adequately serve the

population. Therefore, project construction would not result in the need for new or physically altered library facilities, the construction of which would cause significant environmental impacts. As such, impacts to libraries during construction would be less than significant.

Operation

The proposed project would involve the phased demolition of the existing uses on the OSP Specific Plan Site and would introduce 1,553 new residential units, 45,000 sf of commercial uses, and 85,000 sf of Neighborhood Serving Uses to the OSP Specific Plan Site. On the 327 Harbor Site, 47 residential units would be constructed. Therefore, the proposed project would result in a net increase of 2,715 residents compared to existing uses. In addition, new jobs associated with the commercial uses and Neighborhood Serving Uses would result in approximately 314 employees on the OSP Specific Plan Site (refer to Section 4.10, *Population and Housing*, for a detailed analysis of the potential number of residents and employees associated with buildout of the project).

According to LAPL, the San Pedro Regional Branch Library service population is approximately 82,604 persons. With the addition of the project's 2,715 estimated new residents, the service population of the San Pedro Regional Branch Library would increase to 85,319 persons, or an increase of approximately 3.3 percent. With regard to the potential for project employees to use the San Pedro Regional Branch Library, employment opportunities generated by the proposed commercial and Neighborhood Serving Uses would include a range of full-time and part-time positions anticipated to be filled in part by persons who already reside in the vicinity of the workplace and who may already generate a demand for libraries in the vicinity of the project site. Other employment opportunities would be filled by persons commuting to the project site who would generally opt to use library facilities near their place of residence. Additionally, employees at the project site would have internet access, which provides information and research capabilities and reduces the demand at physical library locations. As such, any new direct or indirect demand for library services generated by project employees is expected to be negligible. The LAPL Branch Facilities Plan lists a facility size criterion of 20,000 sf or greater for regional branches and does not include a population-served criteria for regional branches. The San Pedro Regional Branch Library is approximately 20,000 sf and meets the LAPL Branch Facilities Plan criteria. Therefore, new residents and employees generated by the proposed project would not result in an exceedance of service thresholds for libraries established in the LAPL Branch Facilities Plan.

In addition, as discussed above, the Thresholds Guide considers whether the project includes features that would reduce the demand for library services. As required by PDF LIB-1, the project would provide universal Wi-Fi connectivity throughout residential common areas and public spaces within the project site, which provides information and research capabilities that studies have shown to reduce the demand at physical library locations (Troll 2002; Tenopir 2003). In addition to universal Wi-Fi, the project would include services that would further offset library demand, such as a workforce development center, community rooms, business incubator, and nonprofit offices. Furthermore, the project would generate revenues to the City's General Fund (in the form of application fees, property taxes, sales tax, and business text, etc.) that could be applied toward the provision of new library facilities and related staffing for the library serving the project site and vicinity, as deemed appropriate. The project's revenue for the General Fund would help offset the project-related increase in demand for library services.

In summary, with the services and amenities included in the proposed project, generation of revenues to the City's General Fund that could be applied for the provision of new library facilities and related staffing, and the existing capacity of the San Pedro Regional Branch Library, the project would not be

anticipated to result in substantial increase in demand that would necessitate new or physically altered library facilities, the construction of which would cause significant environmental impacts. As such, impacts to libraries during operation of the project would be less than significant.

Mitigation Measures

Project-level impacts to library facilities would be less than significant. Therefore, no mitigation measures are required.

Significance After Mitigation

Project-level impacts to library facilities were determined to be less than significant without mitigation.

4.11.4.4 Cumulative Impacts

Cumulative growth near the proposed project site includes specific known development projects and general ambient growth. A total of 12 cumulative projects have been identified in the vicinity of the proposed project site, as listed in Section 3.4, *Cumulative Development*. The 12 cumulative projects anticipate adding approximately 1,508 residential units, as well as a variety of non-residential uses. The increase in development and service populations from the proposed project, cumulative projects, and other future development in the San Pedro CPA would result in a cumulative increase in the demand for LAPL services. Cumulative impacts to library services due to construction and operation of cumulative development are discussed further below.

Construction

Similar to the proposed project, construction of cumulative projects would not be anticipated to result in increased residents within San Pedro or substantially increased use of the San Pedro Regional Branch Library to the temporary nature of construction activities and employment patterns of construction workers in southern California. Two of the cumulative projects would be located along 9th Street, two to three blocks east of the San Pedro Regional Branch Library. However, these cumulative projects would be required to prepare a Construction Management Plan to ensure that their respective construction activities or road/sidewalk closures and detours would not affect operation of the library. Therefore, cumulative impacts on libraries during construction would be less than significant.

Operation

The proposed project combined with cumulative development would result in a net increase of 6,364 residents in San Pedro, as well as a reduction of 486 employees. The proposed project along with cumulative projects would increase the service population of the San Pedro Regional Branch Library to 88,968, or by approximately 8.4 percent. Cumulative development would increase demand for library services within San Pedro. However, as discussed under Impact PS-4, the San Pedro Regional Branch Library currently meets and would continue to meet the LAPL Branch Facilities Plan criteria.

In addition, similar to the proposed project, each cumulative project and other future development in the San Pedro CPA 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 at the San Pedro Regional Branch Library, as deemed appropriate. These revenues

to the General Fund would help offset the increase in demand for library services as a result of cumulative development in San Pedro. Furthermore, with the shift in technology from books to computers, the demand for library facilities is changing. 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 LAPL 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 (LAPL 2015). This helps the LAPL to meet increased population demand without the provision of new physical facilities. Therefore, the proposed project and cumulative projects would not result in significant cumulative impacts associated with the provision of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which would cause significant environmental impacts, to maintain service. As such, cumulative impacts to library services would be less than significant.