

Fred Dong – Canyon Hills EIR Comments

In December 1999, there was a wildfire that swept a small area of the San Rafael Hills in Glendale. That area is very much like the Canyon Hills project site and has similar terrain features including an eight-lane freeway that bisects the hills. Large fire breaks such as an eight-lane freeway with a large median did not stop the San Rafael Hills fire of 1999 from spreading. Though that fire did not destroy any homes and it was relatively small, it did move faster, into new areas before resources were available to fight it.

The road widths proposed as mitigation measures for the development are inadequate. Even though they are private roads they should not be any narrower than would be required for a public street. The road widths proposed would not allow for successful evacuation of the residents and the simultaneous entry of fire department personnel and their equipment. If lives and property is to be preserved, the fire department must reach the scene quickly enough and residents must evacuate the area fast enough. Mitigation measures in the EIR must include making the developments' streets, roads, and fire lanes conform with Los Angeles Municipal Code for public streets and roads.

In the recent Southern California Fires road width was an issue. The Los Angeles Times in their November 13, 2003 edition had an article titled "**Roads Were an Obstacle in Fire Fight**". We quote some excerpts from this article.

"But San Bernardino County Fire Marshal Peter Brierty said some of the roads in the Cedar Glen community, where the fire charred more than 350 homes, were too narrow to allow even one fire engine to pass, particularly in spots where residents parked RVs or boat trailers along the shoulder.

During the fires, firefighters tried to protect homes on dead-end roads and cul-de-sacs where there was not enough room to turn a fire engine around to escape quickly, Brierty said. "It's not uncommon for fire response to be delayed because the engine [driver] doesn't want to drive headfirst into a conflagration," he said."

The National Fire Protection Association in their report, NFPA 299 which is now NFPA Report 1144, Standard for Protection of Life and Property from Wildfire presents minimum planning criteria for the protection of life and property from wildfire. Standards include criteria and many different levels and should be contained as part of the discussion of development impacts in the DEIR. We have included excerpts from their report.

Community Planners and Officials

A community's planning and building officials are often the first individuals who communicate local practices and standards to those who want to buy or build in the wildlands. Their understanding of the potential hazards of building in these areas is therefore vitally important. A map indicating potential wildland fire risk should be created for existing and planned structures. The features specified for the map would include several topography-related factors: elevation, slope percent, drainages, prevailing wind direction, worst-case wind direction (toward structures), and broken topography features.

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The wildland fire map should also include fuel types. Zones of possible high-intensity fire must be identified and communicated to property owners. Fuel modification—the removal, spacing, or volume reduction of fuel types to accomplish a reduction in fuel loading—is a primary mitigation measure. Areas with abnormal accumulations of forest litter should be identified, and a review made of past fire history in each area’s fuel bed.

The authority having jurisdiction should evaluate all existing or planned housing developments to determine relative wildland fire protection ratings. In doing this, jurisdictions must review fire danger weather records to determine patterns of rain, heat, humidity, and fuel moisture. Then property owners must be advised of conditions and their responsibilities.

Developers

This event has also focused on the need to have construction standards for homes in the wildlands. The published version of NFPA 299, Standard for Protection of Life and Property from Wildfire, provides important guidance in this area, but it is fully effective only when adopted by local lawmakers.

In the absence of clear and meaningful regulations for the common good, the practices of uninformed developers may create potential hazards. Fire protection features, or their costs, may not be appreciated by uninformed buyers. However, decisions made at the early stages of a development will affect a home’s fire safety for many years in the future.

- All developments should have more than one ingress-egress route and employ looped road networks.
- Roads should be wide enough for simultaneous access for emergency vehicles and the evacuation of residents. In consideration of the long wheelbase of tankers and other emergency vehicles, roads should be constructed with an adequate curve radius.
- Homes along dead-end roads and long driveways provide extra privacy for residents but also provide the potential for fire apparatus to become trapped by spreading fire. These roads and driveways should allow access by large emergency vehicles.
- Developers should reconsider their frequent use of combustible exterior building materials, or at least offer options for more fire safe materials for potential buyers who may not yet understand the differences.
- Developers should also consider the long-range implications of siting unprotected homes on slopes or where water supplies for fire fighting are low or nonexistent.
- Developers can provide a valuable service to new buyers, who may initially be distracted by other moving details, by creating appropriate fuel breaks or greenbelt areas.

Lawmakers

Although the public determines acceptable levels of risk from fire in wildland areas, lawmakers react to the perceived needs of constituents and enact the regulations controlling that level of risk.

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Therefore, it is generally up to homeowners and fire protection agencies to articulate and justify acceptable and unacceptable levels of risk. When losses occur, they usually focus attention on the risks, but preventive actions are preferable. Legislation for such actions may be necessary for homes that are to be located in high hazard areas.

Lawmakers should take the initiative to examine existing laws, regulations, and standards from other jurisdictions that are available for local use in mitigating fire hazards associated with wildland fires. Lawmakers are encouraged to adopt NFPA 299 as one part of the protection provided for new construction in the wildlands. Authorities should provide strong building regulations restricting untreated wood shingle roofs and other practices known to decrease the fire safety of a structure in the wildlands. In the past, untreated wood shingle roofs have repeatedly been shown to be a major contributing factor in the loss of structures to wildfires, yet today some residential subdivisions actually encourage, and some cases even require, wood shingle roofs for aesthetic reasons.

Utility Companies

Downed electrical power lines caused the majority of fires. The lines contained sufficient electrical energy to ignite available combustibles easily. Maintenance issues should be examined along with clearance issues to reduce the risk of devastating wildfires from this cause. Such attention and reduction of risk appears justified since such occurrences can result in multiple fires that easily outstrip fire department resources.

Many western states have adequately addressed this issue.

Other excerpts from NFPA Report 1144 include

4.1.1 When the Authority Having Jurisdiction (AHJ) determines that existing improved property is or planned property improvement will be, located in a wildland/urban interface or intermix area, the AHJ shall performed or cause to be performed, a wildland fire risk and hazard severity analysis of the area to determine relative risk and hazard ratings.

4.1.2 The analysis shall as a minimum, include the following:

- (1) Identification and documentation of wildland fire risk and hazard areas
- (2) Establishment of priorities relative to mitigating the danger from wildland fire
- (3) Determination of mitigation measures for vegetation, other combustibles, and construction criteria.

4.2.1.1 A risk and hazard rating analysis shall be performed to determine the level of the wildland fire threat to life and values at risk.

4.2.1.2 The risk and hazard ratings shall be the basis for the implementation of mitigation measures relative to vegetation, other combustibles and construction criteria.

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- 4.2.1.3 At a minimum, the rating system shall contain the rating factors covered in 4.2.2
- 4.2.2 Analysis Rating Factors
- 4.2.2.1 The history of local wind, relative humidity, temperature, and fine fuel moisture content shall be considered in determining defensible space.
- 4.2.2.2 All vegetative fuels and other combustible materials shall be evaluated for their potential to contribute to the intensity and spread of wildland fire.
- 4.2.2.3 A structure that fails to comply with the requirements of Chapter 8 shall be deemed to increase the risk of the spread of wildland fire to life and improved property and the risk of fires on improved property spreading to wildland fuels.
- 4.2.2.4 Slope and aspect shall be evaluated as to their potential to increase the threat of wildland fire to life or improved property.
- 4.2.2.5 The factors determining required defensible space shall include the history of wildland fire for the area.
- 4.2.2.6 Fire-safe routes for emergency service apparatus and for egress shall be evaluated.
- 4.2.2.7 Other factors that can affect the risk of ignition or the spread of wildland fire on improved property, including the risk of structure fires spreading to vegetation, shall be part of the analysis.
- 4.4.1 The AHJ shall require or cause to be developed a plan to address the risk and hazards identified in the analysis.
- 4.4.2 This plan shall include, but not be limited to, the following:
- (1) Access, ingress, egress and evacuation
 - (2) Fuel modification
 - (3) Water supply
 - (4) Construction, location, and design of structures
 - (5) Ignition potential
- 4.4.3 The AHJ shall approve the mitigating measures relative to access, defensible space, water supply, and construction based upon the relative risk and hazard rating established in 4.1.2
- 4.4.4 No permit associated with construction or occupancy shall be issued until the provisions of this standard are satisfied.

The NFPA in the same report 1144 states that the road grade in the development must not exceed 10%. This is critical for the proper egress by residents and proper ingress by emergency personnel to minimize loss of life and property. If this is not done then the potential impacts of the fire on the development remain significant. Mitigation measures in the EIR must be changed to this standard that the road grade of all roads including any emergency fire lanes shall not exceed 10% rather than 15%. Road grades that are too steep will cause delays and other problems in a natural disaster such as wildfires.

Even though Los Angeles Municipal Code does allow private streets with gradients as steep as 15%, it would not be prudent to do so. LAMC actually recommends streets have a much lesser grade than 15%. In LAMC Section 18.05 subpart D on Private Streets, it says “**Street Grades** On hillside or mountain streets comprising a through route, a grade in excess of six percent (6%) shall not be

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permitted unless a grade not to exceed eight percent (8%) will obviate an excessive curvature or eliminate excessive cuts. **Grades of all streets shall be as low as possible consistent with the advantageous development of the proposed platting and division of land;**

The grade of any street of more than local traffic needs shall not exceed ten percent (10%). No local street grade shall exceed fifteen percent (15%);”.

This development must meet the **goals, objectives, policies, and programs** of the local Community Plan regarding Fire Protection. We have included in our discussion in Community Plan discussion on Fire Protection.

FIRE

PROTECTION

Fire protection services for the Community Plan area are provided by the Los Angeles City Fire Department. The Community Plan area has two City Fire Stations - Fire Station No. 24 and Fire Station No. 74. Station No. 24 is located at 9411 Wentworth Street and Station No. 74 is located at 777 Foothill Boulevard.

GOAL 9 PROTECT THE COMMUNITY THROUGH A COMPREHENSIVE FIRE AND LIFE SAFETY PROGRAM.

Objective 9-1 To ensure that fire facilities and fire protection services are sufficient for the existing and future population and land use.

Policies

9-1.1 Coordinate with the Fire Department as part of the review of significant development projects and General Plan Amendments affecting land use to determine the impact on service demands.

Program: Require a decision maker to include a finding as to the impact on fire service for all Plan amendments within 5 years of Plan adoption.

This coordination with the Fire Department is currently in effect for projects which are subject to the subdivision process and for plan amendments which must be reviewed by the General Plan Advisory Board which includes representation from the Fire Department.

The EIR has stated in this section that the response distance of the Fire Department to the development is outside of the Fire Department standards. Thus, this development would fail Community Plan Objective 9-1 that fire facilities and fire protection services are sufficient for the existing and future population and land use. The fire protection services are not adequate for this area. This would mean that this is a significant and unavoidable impact of the development. This must be discussed in the EIR.

There is no fire station that is near the project area. Also, as the roads in the project will have a steep gradient, the applicant as a mitigation measure should be required to build a new fire station on or near this development.

When you consider the cumulative impacts of all new developments or projects in this community plan area not providing additional fire personnel or fire protection facilities, the overall impact on

this area's Fire Protection is even more acute. All new developments or projects that bring new residents to this area must contribute to providing additional fire and fire department facilities. The level of Fire Protection worsens with each new development but none of these new developments ever contributes towards the protection of the community.

The streets of the project must be widened beyond the minimum city requirements to handle emergency traffic in event of a major emergency. The report does not take into account the added time it would take fire units to respond in a brush fire with roads being congested with residents trying to leave the area.

Any homes that are built in areas that have substantial upslope are prone to greater fire hazard in a fire that is moving uphill. As a mitigation measure, these wildfire dangers should be disclosed to all persons purchasing the lots or homes in the development.

The EIR must also discuss response by ambulance services. This is part of the Fire Department protection but was not discussed in the EIR. Emergency medical services are provided thorough the Bureau of Emergency Medical Services. The City standard for EMS is one and one half miles, similar to that of the desirable response distance for engine companies for neighborhood land uses. Most ambulances are accompanied by trained paramedics to provide additional service other than only transport. LAFD considers EMS to be providing adequate service.

This development will be more than 1 ½ miles from the nearest paramedic service. This would be a significant and unavoidable adverse impact of the development in the area of Fire Protection. A long response time may result in unnecessary deaths by project residents.

The DEIR must incorporate these standards in discussion of fire hazard or danger associated with this development as well as all the standards and regulations that pertain to developments with public streets. Merely because this development will have private streets controlled by home owners associations, the standards of fire safety must not be compromised. Fire danger associated with this development will remain significant unless further mitigation measures are proposed. The EIR must discuss additional areas related to Fire Department Protection.

Section IV. J.2. PUBLIC SERVICES- POLICE PROTECTION

This development must meet the **goals, objectives, policies, and programs** of the local Community Plan regarding Police Protection. We have included in our discussion in Community Plan discussion on Police Protection.

POLICE PROTECTION

The City of Los Angeles Police Department's Foothill Division Station provides police protection services for area's residents. As of 1990, the Foothill Division provides only one police officer per 868 residents. Based on the national standard of 4 officers per 1,000 population, the Community Plan area is grossly underpoliced and its geographic isolation further

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intensifies the problem. Officers who patrol the community are based at the Foothill station located some distance away. There is a need for a substation in the community available to officers on a 24-hour basis where administrative tasks could be performed without driving back to Foothill headquarters.

GOAL 8 -A COMMUNITY WITH ADEQUATE POLICE FACILITIES AND SERVICES TO PROTECT THE COMMUNITY'S RESIDENTS FROM CRIMINAL ACTIVITY, REDUCE THE INCIDENCE OF CRIME AND PROVIDE OTHER NECESSARY LAW ENFORCEMENT SERVICES.

Objective 8-1 To provide adequate police facilities and personnel to correspond with population and service demands in order to provide adequate police protection.

Policies

8-1.1 Consult with the Police Department as part of the review of new development projects and proposed land use changes to determine law enforcement needs and demands.

Program: The decision-maker should include a finding as to the impact on police protection service demands of the proposed project or land use change. Currently, the Police Department is consulted with regard to the impacts of plan amendments on law enforcement needs and demands by the plan amendment review process of the General Plan Advisory Board.

Objective 8-2 To increase the community's and the Police Department's ability to minimize crime and provide security for all residents, buildings, sites, and open spaces.

Policies

8-2.1 Insure that landscaping around buildings be placed so as not to impede visibility.

Program: Discretionary land use reviews and approvals by the Department of City Planning with consultation from the Los Angeles Police Department.

8-2.2 Insure adequate lighting around residential, commercial, and industrial buildings in order to improve security.

Program: Discretionary land use reviews and approvals by the Department of City Planning with consultation from the Los Angeles Police Department.

8-2.3 Insure that recreational facilities in multiple-family residential complexes are designed to provide adequate visibility security.

Program: Discretionary land use reviews and approvals by the Department of City Planning with consultation from the Los Angeles Police Department.

One objective of the Community Plan regarding Police Protection is that adequate police facilities

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and personnel are provided to correspond with population and service demands in order to provide adequate police protection. This development increases the number of residents that the Los Angeles Police Department must serve but does nothing to increase the number of police or police facilities serving this development. By not providing any additional police or facilities, this development will worsen the police protection in the whole region. This is a significant and unavoidable impact on Police Protection that this development will have. This impact has not been currently proposed to be mitigated to a less than significant level.

It is not clear whether the applicant has met Community Plan policy 8-1.1 that says that the applicant must consult with the Police Department as part of the review of new development projects and proposed land use changes to determine law enforcement needs and demands. We do not know what specific needs and demands of this development that the Los Angeles Police Department have proposed for this development.

I believe that the planning division or other body make a finding that this development will have a significant and unavoidable impact on Police Protection in the community. Under Policy 8-1.1, its program states “The decision-maker should include a finding as to the impact on police protection service demands of the proposed project or land use change. Currently, the Police Department is consulted with regard to the impacts of plan amendments on law enforcement needs and demands by the plan amendment review process of the General Plan Advisory Board.”

Response time to some parts of the project by the police will be substantially longer than the average response time for Police response listed in the EIR. The police units would have to drive on roads that are steep, narrow and curvy. These windy residential streets will have a significant gradient of up to 15% as the development is currently proposed.

Based upon the 1990 ratio of residents to Los Angeles Police officers in the Foothill Division a development of 831 residents should increase the number of LA Police officers by 1. Even if you were to use the expected number of residents that we believe would inhabit the project site, 1,120, the increase in LA Police officers should be 1.3.

The crime rate in the Foothill Division according to the Los Angeles Police Department Letter found in Appendix C of the EIR indicates that the crime rate for 2001 and 2002 was the same at 35 crimes per 1,000 residents. The EIR should obtain more years of crime statistics for the Foothill Division and RD 1694. Using several years of data will show trends and patterns in the crime rate occurrence. Using only 1 or 2 years to base assumptions on the crime rates and level of police protection needed could be problematic if the 1 or 2 years selected for analysis had significantly higher or lower rates of crime than several years worth of data. Like the traffic analysis data, the data discussed in 2002 may not be representative of the overall crime rate or trends.

However, if we were to use the crime rate of 35 crimes per 1,000 residents, in a given year, we would expect to have 29 crimes committed per 831 residents or 39 crimes per 1,120 residents. This would mean that there would be expected to have about 2 ½ to 3 crimes per month in this

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new development. This will increase the average response time from 11.4 minutes in 2002 and 11.0 minutes in 2001. The Los Angeles Police Department in their letters dated May 13, 2002 and February 26, 2003 to Christopher Joseph and Associates states that “A project of this size would have a significant impact on the police services in Foothill Area.”

The statements made by the Los Angeles Police Department indicate that this development will have a significant impact on that area’s police protection. CEQA Guidelines in Section 15382 define a significant effect on the environment as a substantial or potentially substantial, adverse change in any of the physical conditions within the area affected by the project. This development will have an adverse effect on Police Protection in the area. Therefore, this development will have a significant impact on Police Protection because no new police personnel or facilities are being provided by this development.

Even if the development hires an alarm company to establish security alarms, it still does not replace police protection. The Los Angeles Police still have to respond to these alarms. Response by the Los Angeles Police to crimes or false alarms committed in this development will adversely impact Police Protection for the area. According to Los Angeles Police Department statistics, most alarms that they receive are false. Even if the crime rate is only 35 crimes per 1,000 residents per year, the number of false alarms could be much greater and divert police from preventing or stopping actual crimes in the rest of the district.

Even if the applicant or development homeowners associations do give the police information that would facilitate their response, the Los Angeles Police will have to respond to alarms and reports of crimes in the development. Again, this will divert Police resources away from protecting the rest of the Foothill Division. The EIR report indicates that there is only 1 patrol car that is assigned to the area that the proposed development is in RD 1694. This unit can only respond to one emergency in RD 1694 at a time. The impact of this development on Police Protection is significant.

This development does impact the maintenance of acceptable service ratios, response times, and other performance objectives of the Los Angeles Police Department. This development does have a significant impact under CEQA.

When you consider the cumulative impacts of all new developments or projects in this community plan area not providing additional police personnel or police facilities, the overall impact on this area’s Police Protection is even more acute. All new developments or projects that bring new residents to this area must contribute to providing additional police and police facilities. The level of Police Protection worsens with each new development but none of these new developments ever contributes towards the protection of the community.

I believe that the mitigation measures proposed do not bring this development’s threshold of significance to a less than significant level with the mitigation measures proposed. The EIR must make the finding that the development will have a significant and unavoidable impact on Police Protection unless the development devises a plan to increase police

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personal or facilities serving the area. The EIR must address the issues and concerns that we have raised regarding Police Protection.

Section IV. J.3. PUBLIC SERVICES-RECREATION AND PARKS

The local Community Plan outlines the Community Requirements for Recreation and Park Facilities. We have included this in our discussion of recreation and park facilities.

RECREATION AND PARK FACILITIES

In the Community Plan area, public parks and recreation areas are managed by the City of Los Angeles Recreation and Parks Department. The City classifies parks according to three types: Regional, Community, and Neighborhood.

GOAL 4- ADEQUATE RECREATION AND PARK FACILITIES WHICH MEET THE NEEDS OF THE RESIDENTS IN THE COMMUNITY.

Objective 4-1 To conserve, maintain and better utilize existing recreation and park facilities which promote the recreational experience.

Policies

4-1.1 Preserve and improve the existing recreational facilities and park space.

Program: These sites area designated in the Open Space (OS) Zone, which provides such protection.

4-1.2 Better utilization and development of recreational facilities at existing parks.

Program: The Los Angeles Unified School District, and the City's Department of Recreation and Parks should develop programs to fully utilize each of their respective sites.

Objective 4-2 To provide facilities for specialized recreational needs within the community, with consideration given to utilizing existing public lands such as flood control channels, utility easements, or Department of Water and Power property.

Policies

4-2.1 Flood control channels and other appropriate public lands should be considered for open space purposes. Hiking, bicycle and equestrian trails in the area should connect these facilities with the local and regional system.

Program: Implement the proposed hiking, bicycle, and equestrian trails shown on the Community Plan Map.

Objective 4-3 To expand and improve local parks throughout the Plan area on an accelerated basis, as funds and land become available.

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Policies

4-3.1 Develop new neighborhood and community parks to help offset the Community Plan areas parkland deficiency for its current population and its projected year 2010 population.

It is a positive step that this development will offer a 3 acre equestrian park that can be utilized by all members of the community and that an additional 1.7 acres of other onsite recreational facilities. These 1.7 acres of other onsite recreational facilities must be identified on the EIR. If they are not, they probably will not get developed as no one will know where they are. These recreational facilities must not be located near or by hazardous areas such as within 150 feet of the Edison Transmission lines. Also, these facilities should have public access. Goal 4 of the Community Plan says adequate recreation and park facilities need to be provided which meet the needs of the residents in the community. This should mean that all residents should have access.

The location of the 3 acre equestrian park looks like it is located in a flood plain or debris collection area. It may be advisable to relocate this facility to another location that would not be impacted by debris, floods, or even normal rainstorms. If this is not done, all structures and other improvements must be made secure to withstand the impact of debris or floods that will impact the area. The much of the entire La Tuna Canyon wash drainage goes through the proposed equestrian park. Also, as another mitigation measure, signs warning of floods or debris flow must be posted in this park if it is not relocated. Also, escape routes out of the park must be posted, explained and developed, if equestrian park users become trapped by debris or flood waters in the park. Such park users when a flood or debris flow in the area occurs may be trapped on the side of the park opposite La Tuna Canyon Road. Such users may not be able to cross the debris flow or flood area to reach safety at La Tuna Canyon Road.

Also, the parking lot of the equestrian park is so small that only two horse trailers could park there at any time. This greatly restricts the use of the park that was intending to serve the entire equestrian community. As it is planned, this park will not fulfill that purpose.

Also, no adult native trees that exist on the 3 acres equestrian park site must be damaged or destroyed in the construction of the park. Some of the trees in the area are old and large. The plans for the park are imprecise and do not disclose the extent of the grading and vegetation removal, damage or destruction. These impacts must be discussed in the EIR.

We want in writing an assurance that 693 acres on the project site will be preserved as open space or recreational areas on the site. We want a written assurance that these lands will not be developed for future residential or commercial purposes.

If all these mitigation measures are done and the recreational areas are developed by the applicant, this project will not have a significant adverse impact on recreation and parks but instead have a positive impact on the community.

The EIR must discuss how existing equestrian trails that are designated under the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan will be impacted by this

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development. The Scenic Preservation Specific Plan describes two types of Equestrian trails. These trails may exist on the property site and may be impacted by the development. Under the Scenic Preservation Plan they are described as,

Non-Public Equestrian Trails. Unimproved trails over private property as shown on Map No. 4 of this Plan in which the public may possibly have a prescriptive easement.

Official Equestrian Trail. Existing trails that are established under legal easement and those that are designated for future dedication as shown on Map No. 3.

The EIR must modify its park proposals to conform with the Community Plan and safety concerns and the Scenic Plan.

Section IV. J.4. PUBLIC SERVICES-LIBRARIES

The local Community Plan outlines the Community Requirements for Libraries. We have included this in our discussion of libraries.

LIBRARIES

The Community Plan area is currently served by the Sunland-Tujunga Branch Library. In 1995, a 10,500 square-foot library was constructed, replacing the existing 4,500 square-foot library. Library area needed for the Community Plan should be approximately 26,000 square feet.

GOAL 7 ENSURE THAT ADEQUATE LIBRARY FACILITIES ARE PROVIDED FOR THE COMMUNITY'S RESIDENTS.

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

Policies

7-1.1 Provide construction of new libraries when the need is identified and funding is available.

Program: The community and the City have identified the need for a new library in the Lake View Terrace area. Funds are now being identified and several sites are being considered.

7-1.2 Encourage flexibility in siting libraries in mixed-use projects, shopping malls, pedestrian-oriented areas, office buildings, and similarly accessible facilities.

Program: Through the inclusion of this policy the Plan supports such utilization when the Library Department and decision-makers review and approve sites for new libraries.

The goal of the Community Plan is that adequate library facilities are provided for the community

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residents. Policy 7-1.1 of the Community Plan is to provide the construction of new libraries when the need is identified. The addition of 831 residents per the EIR or 1,120 residents as we believe will be added to the area does constitute a need for additional facilities to provide adequate library service for the community. The applicant is not contributing any funds towards the expansion of existing library facilities and the acquisition of additional books.

The EIR states that “The project’s demand for library facilities was calculated using the State of California standards, which are .5 square feet of facility space per resident and two volumes of permanent collection per resident. This was the standard used in the City of Los Angeles General Plan Framework EIR. Based on these standards, the project would generate an additional library need of approximately 415.5 square feet of space and 1,662 volumes of permanent collection.” This is a significant adverse impact if these facilities and books are needed and the applicant does nothing to mitigate the impact.

Also according to the Los Angeles Public Library statement in the EIR, the additional residents generated by the proposed project would adversely affect its ability to maintain its current levels of service. If the CEQA standards for impacts on library services would be significant if the proposed project would result in a substantial adverse physical impact associated with the provision or need of new *or physically altered libraries, ... in order to maintain acceptable service ratios or other performance objectives of the LAPL*. This has met the standard according to CEQA that this project does cause an adverse impact on the acceptable service ratios and other performance objectives of the Los Angeles Library system. The development has created a need for additional space and additional books which the developer is not mitigating. Therefore, this is a significant and unavoidable adverse impact without mitigation. The EIR consultant must change their findings because the facts do not support the conclusion that they have reached.

Also, the EIR did not discuss the cumulative impacts of this problem. This must be discussed in the EIR. When you consider the cumulative impacts of all new developments or projects in this community plan area not providing additional library resources or facilities, the overall impact on this area’s library service is even more acute. All new developments or projects that bring new residents to this area must contribute to providing additional library resources and library facilities. The level of Library Service worsens with each new development but none of these new developments ever contributes towards providing these services to the community.

The EIR must recommend as a mitigation measure that the Developer must pay for the expansion of the library building and the acquisition of new volumes. The EIR consultant’s conclusion that this development would not have a significant impact on library services is erroneous. This impact must be mitigated by the developer.

The conclusion concerning the impacts of this development on Library Services is incorrect and must be changed, otherwise it is misleading. The EIR must discuss additional areas of impact of this development on Library Services concerning the Community Plan and Cumulative Effects.